

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Thomas, Richard (EEO)[Richard.Thomas@vw.com]  
**From:** Giles, Michael (EEO)  
**Sent:** Fri 6/6/2014 12:54:36 PM  
**Subject:** VW Group - Decision Info Golf 1.8L Automatic

Hello Jim,

Today we submitted vehicle info, test results and decision info for the Golf 1.8L with automatic trans for test group FVGAV02.0APA.

Vehicle ID: FAPA-RAF / config # 0.

Purpose: FEDV

Tests submitted: FTP / Hwy

Our understanding as of earlier in the year was that you might be interested in this vehicle, but we are not sure if that is still the case.

Thanks,

Mike

Michael Giles

Certification Engineer

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4229

Fax: 248 754 4207

mailto: [Michael.Giles@VW.com](mailto:Michael.Giles@VW.com)



**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Ex. 7  
**Sent:** Thur 6/5/2014 9:31:55 PM  
**Subject:** SCR/AECD Description Update

Hello Jim:

As we discussed by telephone, the update to the 2.0L TDI SCR description has been submitted to VERIFY shortly after 2:00 p.m. today.

Best regards,

Ex. 7

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: Ex. 7

Cell: Ex. 7

E-Mail: Ex. 7

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Wed 6/4/2014 5:47:27 PM  
**Subject:** RE: Test Group FVGAJ03.0AUD

Thanks I will have a look.

Bill

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Wednesday, June 04, 2014 12:29 PM  
**To:** Rodgers, William (EEO)  
**Subject:** Test Group FVGAJ03.0AUD

Bill, I finished reviewing the Audi certs. For the Test Group FVGAJ03.0AUD / Evaporative FVGAR0140AAD, on page 4 of the Appilcation pdf it shows the evap test vehicle as D3UF-Q5A / 1. It should be config 0 not 1. It appears to be correct everywhere else so I will approve the certificates now and you can revise the pdf

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

To: Snyder, Jim[Snyder.Jim@epa.gov]  
Cc: [Ex. 7]@vw.com]; [Ex. 7]  
From: [Ex. 7]  
Sent: Tue 5/27/2014 12:23:20 PM  
Subject: VW Group - Scheduling Requests

Hello Jim,

I would like to discuss our scheduling needs with you today when you have a minute. As reference I am sending in writing below, our timing needs for 4 upcoming vehicle tests:

- 1) Passat TDI currently scheduled for CW24: We request to move this test to timeframe of CW 27/28 (weeks of June 30 or July 8) if possible, or CW26 otherwise.
- 2) Jetta 2.0 TDI (selected) We will submit supplemental information (ready date CW 27 / June 30)
- 3) Jetta 2.0 MPI (selected) We will submit supplemental information (ready date CW 27 / June 30)
- 4) E-Golf (BEV): We made a special request below for allowance of testing in CW28 (July 7).

Please note for item 1 above, we are requesting a move to CW 27 or 28.

In addition, for item 4 we have requested a special scheduling allowance (if possible) for the e-Golf in CW28.

For the two Jetta vehicles listed in items 2 /3, we will submit the supplemental information today to initiate the scheduling date at EPA , which is requested for CW27.

I will try to call you later this morning to discuss.

Regards,

**Ex. 7**

**Ex. 7**

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: **Ex. 7**

Fax: **Ex. 7**

mailto: **Ex. 7**

**From:** **Ex. 7**

**Sent:** Wednesday, May 21, 2014 1:41 PM

**To:** Wright, DavidA (Wright.DavidA@epa.gov)

**Cc:** Snyder, Jim; Rodgers, **Ex. 7**

**Ex. 7** (@vw.com)

**Subject:** VW Group - e-Golf Test Schedule Request

Hello David,

As we discussed, Volkswagen is planning to complete our manufacturer testing of the new MY 2015 e-Golf in the next few weeks. This vehicle, which will be introduced later this year, is the first BEV for the US market, and therefore it is especially important for us to meet our tight timing and performance targets.

It is understood that this vehicle will be confirmatory tested at EPA.

**We are hereby requesting that EPA make an early scheduling allowance for the testing of this vehicle, for the week of July 7<sup>th</sup>, or the next earliest available time.**

Our goal is to insure that this window is available in the EPA schedule at the time we make the test data submission. AT the latest we expect our submissions to be completed by June 25, but plan on an earlier submission.

Thank you in advance for your consideration. Please let us know if you are able to assist us with this request.

Regards,

Ex. 7

**Ex. 7**

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: **Ex. 7**

Fax: **Ex. 7**

mailto: **Ex. 7**

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** [Ex. 7]@vw.com]; [Ex. 7]  
[Ex. 7]@volkswagen.de]  
**From:** [Ex. 7]  
**Sent:** Fri 5/23/2014 11:51:43 AM  
**Subject:** FW: EPA PHEV / BEV Questions  
PHEV BEV Question EPA.pdf

Hello Jim,

This might circle back to you. I did not get a response back from Linc and Dave, so we would still like to set up a meeting sometime soon to discuss our open questions. We did get some clarifying information from Rob French last week and my colleagues in Germany are revising the presentation accordingly. We will get back to you when you are back in the office next week. I will be traveling next week but I expect you may get contact from one of us.

Thank you and best regards,

[Ex. 7]

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**From:** [Ex. 7]  
**Sent:** Thursday, May 15, 2014 9:11 AM  
**To:** wehrly.linc@epa.gov; 'wright.davida@epa.gov'  
**Subject:** FW: EPA PHEV / BEV Questions

Hello Linc and David,

I just sent this email to Jim asking for a meeting and attaching some PHEV and BEV certification questions. Is it possible to discuss these points next week? Let me know if you have time available and I can set up a meeting.

Thank you and best regards,

[Ex. 7]

---

**From:** [Ex. 7]  
**Sent:** Thursday, May 15, 2014 8:47 AM  
**To:** Snyder, Jim (Snyder.Jim@epa.gov)  
**Subject:** FW: EPA PHEV / BEV Questions

Hello Jim,

The VW Group would like to schedule a meeting (or conference call) with EPA staff and VW certification staff to discuss PHEV and BEV certification. There are still some questions we have regarding PHEV calculations and testing we would like to discuss with you. In advance of the meeting please see the

attached presentation with our open points or questions.

Is there a time that works best for you? My proposal is to have the meeting early next week if that is possible for EPA staff. I understand you may want to discuss our questions internally first.

Thank you and best regards,

Ex. 7



**To:** Wright, DavidA[Wright.DavidA@epa.gov]  
**Cc:** Snyder, Jim[Snyder.Jim@epa.gov]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Thur 5/22/2014 6:29:35 PM  
**Subject:** VW Group Decision information - 2.0l TDI

Hello David,

I have submitted four additionally fuel economy vehicle decision information files for consideration. These complete the test submissions for 2.0L TDI-SCR diesel models with automatic transmission. If you have any questions please let me know.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

To: Wright, DavidA[Wright.DavidA@epa.gov]  
Cc: Snyder, Jim[Snyder.Jim@epa.gov]; Ex. 7 @vw.com; Ex. 7  
Ex. 7  
From: Ex. 7  
Sent: Wed 5/21/2014 5:41:25 PM  
Subject: VW Group - e-Golf Test Schedule Request

Hello David,

As we discussed, Volkswagen is planning to complete our manufacturer testing of the new MY 2015 e-Golf in the next few weeks. This vehicle, which will be introduced later this year, is the first BEV for the US market, and therefore it is especially important for us to meet our tight timing and performance targets.

It is understood that this vehicle will be confirmatory tested at EPA.

**We are hereby requesting that EPA make an early scheduling allowance for the testing of this vehicle, for the week of July 7<sup>th</sup>, or the next earliest available time.**

Our goal is to insure that this window is available in the EPA schedule at the time we make the test data submission. AT the latest we expect our submissions to be completed by June 25, but plan on an earlier submission.

Thank you in advance for your consideration. Please let us know if you are able to assist us with this request.

Regards,

Ex. 7

**Ex. 7**

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone:

Fax:

mailto:

**Ex. 7**

**To:** Wright, DavidA[Wright.DavidA@epa.gov]  
**Cc:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Snyder, Jim[Snyder.Jim@epa.gov]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Wed 5/21/2014 11:04:15 AM  
**Subject:** RE: VW361-0-0250 Confirmatory Test - Jetta 2.0MPI

Thanks David. We will prepare the vehicle for shipping.

Regards

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**From:** Wright, DavidA [mailto:Wright.DavidA@epa.gov]  
**Sent:** Tuesday, May 20, 2014 3:45 PM  
**To:** Rodgers, William (EEO)  
**Cc:** Allen, Gregory (EEO); Giles, Michael (EEO); Snyder, Jim  
**Subject:** VW361-0-0250 Confirmatory Test

Bill,

The last confirmatory testing I find in the EPA data base for VW361-0-0250 took place in 2010 for the 2011 MY. The highway test results on that vehicle were a little over 41 MPG which were run at and confirmed at EPA. It appears the tires have significantly reduced the rolling resistance and based on the fairly significant increase in highway fuel economy observed on the new testing compared to the previous testing I located, EPA is interested in performing a confirmatory test on this FEDV.

Let me know if there are more recent data I have missed.

Regards,

David

David A. Wright

Light-Duty Vehicle Center, Compliance Division

National Vehicle and Fuel Emissions Laboratory

Phone: (734) 214-4467

E-mail: [wright.davida@epa.gov](mailto:wright.davida@epa.gov)

To: Wright, DavidA[Wright.DavidA@epa.gov]  
Cc: Snyder, Jim[Snyder.Jim@epa.gov]; [Ex. 7]@vw.com; [Ex. 7]  
[Ex. 7]  
From: [Ex. 7]  
Sent: Tue 5/20/2014 9:37:57 PM  
Subject: RE: Quick review of FVGAV02.0VBD

Hello David:

We will look into these questions and get back to you as soon as possible.

Best regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone:

Cell:

E-Mail:

**Ex. 7**

**From:** Wright, DavidA [mailto:Wright.DavidA@epa.gov]

**Sent:** Tuesday, May 20, 2014 4:24 PM

**To:** [REDACTED] Ex. 7

**Cc:** Snyder, Jim

**Subject:** Quick review of FVGAV02.0VBD

**Ex. 7**

I am contacting you as I am not sure who the appropriate VW contact would be with respect to the application for test group FVGAV02.0VBD. I have taken a quick look at the common (December 5, 2013 document) and test group applications and have not been able to locate information describing either the durability test group or the evaporative emission families. Also the OBDII approval letter included with the application is from a 2014 OBD test group, there does not appear to be an official approval of the 2015 OBD test group included in the application.

Lastly, two of the VECI label examples list the OBD as F II while the third OBD label includes the more detailed acronym Fed II. Not sure if this is of any significance, but, thought I would mention it since I noticed the difference.

Let me know if you have any questions or comments. I look forward to hearing VWs response with respect to the issues raised.

Regards,

David

David A. Wright

Light-Duty Vehicle Center, Compliance Division

National Vehicle and Fuel Emissions Laboratory

Phone: (734) 214-4467

E-mail: [wright.davida@epa.gov](mailto:wright.davida@epa.gov)



**To:** Wright, DavidA[Wright.DavidA@epa.gov]  
**Cc:** Snyder, Jim[Snyder.Jim@epa.gov]; Rodgers, William (EEO)[William.Rodgers@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Allen, Gregory (EEO)  
**Sent:** Mon 5/19/2014 8:10:01 PM  
**Subject:** Decision Information Uploaded to Verify

Hello David,

Two confirmatory test decisions were uploaded to Verify for the MY2015 Volkswagen Jetta 2.0 MPI (Automatic and Manual), Testgroup: FVGAV02.0VUC. The Vehicle ID's are listed below.

Automatic: VW361-0-0250

Manual: VW361-0-0221

There was also some information that I uploaded by mistake for Vehicle ID: VW361-0-221. You can disregard this test data and decision information as this is the wrong Vehicle ID. Unfortunately I was finishing up and filing the documents when I noticed the discrepancy.

My apologies for any inconvenience this may cause.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Allen, Gregory (EEO)  
**Sent:** Thur 5/15/2014 2:11:55 PM  
**Subject:** MY14 Running Change Application EADXJ03.04UG

Hello Jim,

Just an fyi to let you know that a running change application was uploaded to Verify yesterday for the MY2014 Audi EADXJ03.04UG test group to reflect new software and DPF regeneration strategy that effects the upward and downward adjustment factors. In adjacent with this submission, a new KI factor submission letter for MY14 was uploaded for this testgroup as well.

In conjunction with the MY14 submission, a revised Initial MY15 application and subsequent KI factor submission letter were uploaded for the FVGAJ03.0NU4 testgroup for the same topic as mentioned above.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Ex. 7  
**Sent:** Thur 5/15/2014 12:46:49 PM  
**Subject:** FW: EPA PHEV / BEV Questions  
PHEV BEV Question EPA.pdf

Hello Jim,

The VW Group would like to schedule a meeting (or conference call) with EPA staff and VW certification staff to discuss PHEV and BEV certification. There are still some questions we have regarding PHEV calculations and testing we would like to discuss with you. In advance of the meeting please see the attached presentation with our open points or questions.

Is there a time that works best for you? My proposal is to have the meeting early next week if that is possible for EPA staff. I understand you may want to discuss our questions internally first.

Thank you and best regards,

**Ex. 7**

**To:** Wright, DavidA[Wright.DavidA@epa.gov]  
**Cc:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]; Snyder, Jim[Snyder.Jim@epa.gov]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Mon 5/12/2014 1:36:55 PM  
**Subject:** RE: Audi Q3 - FAUA-Q3F

David,

According to the US06 test lab report we show the result was 25.7 MPG. The factory result was 26.2, resulting in a difference of 2.3%. Give me a call this morning to discuss. If I am unavailable please call Greg Allen at 248-754-4209.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**From:** Wright, DavidA [mailto:Wright.DavidA@epa.gov]  
**Sent:** Monday, May 12, 2014 8:49 AM  
**To:** Rodgers, William (EEO)  
**Cc:** Mazaitis, Vincent; Snyder, Jim; Allen, Gregory (EEO)  
**Subject:** RE: Audi Q3 - FAUA-Q3F

Bill,

Thank you for the information regarding the key location impacting the battery state of charge. We will keep the key in the scheduling office and not in or on the vehicle to ensure the battery state of charge is not drained. We are able to charge the battery prior to the preconditioning, however, a battery charger will not be put on the vehicle on the night before the test.

In addition to the FTP being outside the 3% window, according to our records, the vehicle was also outside the 3% window for the US06 test. I am wondering if you would also want the US06 re-tested?

Once we know your preference regarding retesting the US06 we will put in the request for retest.

Regards,

David

David A. Wright

Light-Duty Vehicle Center, Compliance Division

National Vehicle and Fuel Emissions Laboratory

Phone: (734) 214-4467

E-mail: [wright.davida@epa.gov](mailto:wright.davida@epa.gov)

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Monday, May 12, 2014 7:51 AM  
**To:** Wright, DavidA  
**Cc:** Mazaitis, Vincent; Snyder, Jim; Allen, Gregory (EEO)  
**Subject:** RE: Audi Q3 - FAUA-Q3F

Hello David,

We would like to schedule a retest of the FTP cycle considering it is outside the 3%.

Additionally, we would like to insure the vehicle's battery is fully charged after sitting at your facility, therefore we request that a battery charger be put on the vehicle the night before the test. Occasionally a vehicle can be left unlocked with the keys inside resulting in a prolonged drain on the battery.

Please let us know when the retest will take place.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Wright, DavidA [<mailto:Wright.DavidA@epa.gov>]  
**Sent:** Friday, May 09, 2014 2:09 PM  
**To:** Rodgers, William (EEO)  
**Cc:** Mazaitis, Vincent; Snyder, Jim  
**Subject:** FW:

William,

Attached are the results from the testing on the vehicle. Please do not hesitate to contact me if you have any questions.

Regards,

David

David A. Wright

Light-Duty Vehicle Center, Compliance Division

National Vehicle and Fuel Emissions Laboratory

Phone: (734) 214-4467

E-mail: [wright.davida@epa.gov](mailto:wright.davida@epa.gov)

**From:** Mazaitis, Vincent

**Sent:** Friday, May 09, 2014 10:11 AM  
**To:** Wright, DavidA  
**Subject:**



**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]; Snyder, Jim[Snyder.Jim@epa.gov]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Wright, DavidA  
**Sent:** Mon 5/12/2014 12:48:43 PM  
**Subject:** RE: Audi Q3 - FAUA-Q3F

Bill,

Thank you for the information regarding the key location impacting the battery state of charge. We will keep the key in the scheduling office and not in or on the vehicle to ensure the battery state of charge is not drained. We are able to charge the battery prior to the preconditioning, however, a battery charger will not be put on the vehicle on the night before the test.

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Once we know your preference regarding retesting the US06 we will put in the request for retest.

Regards,

David

David A. Wright

Light-Duty Vehicle Center, Compliance Division

National Vehicle and Fuel Emissions Laboratory

Phone: (734) 214-4467

E-mail: wright.davida@epa.gov

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Monday, May 12, 2014 7:51 AM  
**To:** Wright, DavidA  
**Cc:** Mazaitis, Vincent; Snyder, Jim; Allen, Gregory (EEO)  
**Subject:** RE: Audi Q3 - FAUA-Q3F

Hello David,

We would like to schedule a retest of the FTP cycle considering it is outside the 3%.

Additionally, we would like to insure the vehicle's battery is fully charged after sitting at your facility, therefore we request that a battery charger be put on the vehicle the night before the test.

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Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Wright, DavidA [<mailto:Wright.DavidA@epa.gov>]

**Sent:** Friday, May 09, 2014 2:09 PM

**To:** Rodgers, William (EEO)

**Cc:** Mazaitis, Vincent; Snyder, Jim

**Subject:** FW:

William,

Attached are the results from the testing on the vehicle. Please do not hesitate to contact me if you have any questions.

Regards,

David

David A. Wright

Light-Duty Vehicle Center, Compliance Division

National Vehicle and Fuel Emissions Laboratory

Phone: (734) 214-4467

E-mail: [wright.davida@epa.gov](mailto:wright.davida@epa.gov)

**From:** Mazaitis, Vincent  
**Sent:** Friday, May 09, 2014 10:11 AM  
**To:** Wright, DavidA  
**Subject:**

**To:** Wright, DavidA[Wright.DavidA@epa.gov]  
**Cc:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]; Snyder, Jim[Snyder.Jim@epa.gov]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Mon 5/12/2014 11:51:04 AM  
**Subject:** RE: Audi Q3 - FAUA-Q3F

Hello David,

We would like to schedule a retest of the FTP cycle considering it is outside the 3%.

Additionally, we would like to insure the vehicle's battery is fully charged after sitting at your facility, therefore we request that a battery charger be put on the vehicle the night before the test. Occasionally a vehicle can be left unlocked with the keys inside resulting in a prolonged drain on the battery.

Please let us know when the retest will take place.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**From:** Wright, DavidA [mailto:Wright.DavidA@epa.gov]  
**Sent:** Friday, May 09, 2014 2:09 PM  
**To:** Rodgers, William (EEO)  
**Cc:** Mazaitis, Vincent; Snyder, Jim  
**Subject:** FW:

William,

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Regards,

David

David A. Wright

Light-Duty Vehicle Center, Compliance Division

National Vehicle and Fuel Emissions Laboratory

Phone: (734) 214-4467

E-mail: [wright.davida@epa.gov](mailto:wright.davida@epa.gov)

**From:** Mazaitis, Vincent  
**Sent:** Friday, May 09, 2014 10:11 AM  
**To:** Wright, DavidA  
**Subject:**



**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Mazaitis, Vincent  
**Sent:** Wed 4/30/2014 12:31:33 PM  
**Subject:** RE: VW Group Confirmatory Testing on Wednesday

Good morning Bill,

I'll arrange for the confirmatory testing, no problem. The lab frowns on us giving tours, so I'll try to arrange that with lab personnel. Thanks for the "Heads Up!"

Vince Mazaitis

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Wednesday, April 30, 2014 8:25 AM  
**To:** Mazaitis, Vincent  
**Subject:** VW Group Confirmatory Testing on Wednesday

Hi Vince,

I will attend the Audi Q3 confirmatory tests on Wednesday May 7<sup>th</sup> and plan to bring two coworkers who are involved in our IUVP activities. Can you possibly give us a ten-cent tour of the lab once the testing starts?

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.



Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Allen, Gregory (EEO)  
**Sent:** Fri 4/25/2014 3:19:11 PM  
**Subject:** RE: VW Group - Revised Certificate Request

Hello Jim,

Just to clarify – a revised certificate is needed for the below testgroup / Evap family.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**From:** Allen, Gregory (EEO)  
**Sent:** Friday, April 25, 2014 11:02 AM  
**To:** snyder.jim@epa.gov  
**Cc:** Rodgers, William (EEO); Giles, Michael (EEO)  
**Subject:** VW Group - Revised Certificate Request

Hello Jim,

I submitted a Certificate Lock Request for Testgroup / Evap family: FVGAV02.0APA / FVGAR0110ABB. The request is related to the running change CBI\_FVGAV02.0APA\_APP\_C01\_R00 to add a new FEDV model, of which the revised Certification Application, including the attached letter, was uploaded to Verify.

Please let us know if you have any questions.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Allen, Gregory (EEO)  
**Sent:** Fri 4/25/2014 3:02:03 PM  
**Subject:** VW Group - Revised Certificate Request  
[VGA RC01-14 EPA Letter.pdf](#)

Hello Jim,

I submitted a Certificate Lock Request for Testgroup / Evap family: FVGAV02.0APA / FVGAR0110ABB. The request is related to the running change CBI\_FVGAV02.0APA\_APP\_C01\_R00 to add a new FEDV model, of which the revised Certification Application, including the attached letter, was uploaded to Verify.

Please let us know if you have any questions.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

Leonard W. Kata Name  
Manager Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
leonard.kata@vw.com E-Mail

April 25, 2014 Date

Subject: Running Change for MY 2015 Volkswagen Group Test Group:  
FVGAV02.0APA

Dear Mr. Snyder,

We are submitting the attached Running Change information to add new models to the Test Group FVGAV02.0APA. A revised Certification Application has been uploaded to the Verify system for issuance of a revised Certificate of Conformity

Copies of the Certification Fee filing form and OBD approval letter are contained in sections 15 and 16 of the included electronic application.

All vehicles within this test group comply with all applicable regulations contained in 40 CFR Part 86 and the compliance statements contained in sections 8 and 14.

This submission constitutes our final application and the request for issuance of a Certificate of Conformity.

If you have any questions with regard to this information please contact our office in Auburn Hills at (248) 754-4224 or (248) 754-4219.

Sincerely,



Leonard W. Kata  
Volkswagen Group of America, Inc.

Engineering and Environmental Office

Enclosure(s)

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

# **Running Change**

## **MY 2015**

**Date** 04-025-2014

**Report Number:** RC\_FV2.0APA\_01\_14

Test Group: FVGAV02.0APA

Vehicles Affected: Volkswagen Golf

Transmission: all

**Event:** 1) Addition of Volkswagen Golf as new Fuel Economy Vehicle for the test group.

Change is effective with start of production week 12/2014

**Analysis:** Not necessary

**Activities:** Revised Certification Application submitted to EPA under separate cover. Fuel economy tests were previously submitted to the EPA.

**Hardware changes:** None

**Impact on Emissions:** None

## Running Change / Field Fix Log

Model Year: 2015

Test Group: FVGAV02.0APA

Models: Audi A3, A3 quattro, A3 Cabriolet, A3 Cabriolet quattro;  
Volkswagen GTI, Golf 1.8L

Evaporative Families: FVGAR0110ABB

RC / FF Number	Description of Change / Reason	Date
RC_FV2.0APA_01_14	Addition of a model: VW Golf	04-24-2014

Prefix:

RC = Running Change

RF = Running Change / Field Fix

FF = Field Fix

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Fri 4/25/2014 2:13:25 PM  
**Subject:** VW Group - Diesel Tests Submitted

Hello Jim,

I have submitted the Decision Information for the EDV configured as a Passat TDI for our new 2.0L 4-cylinder diesel test group FVGAV02.0VAL. Manufacturer retests are required should you decide to waive these tests.

Note - The tests for the highest selling model configuration (Jetta TDI) for this test group are expected next week, along with tests for Golf TDI, Beetle TDI, Beetle Convertible TDI.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219



**To:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]; Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Tue 4/15/2014 7:29:39 PM  
**Subject:** RE: FAUE-DAQ

Hello Jim and Vince,

Although minor, we've noticed upon further review of the lab results from the recent Audi A8 tests that the percentage difference of 7.73% noted on the FTP result was erroneous due to the comparison being made to the Manufacturer test performed while in Start/Stop Active mode.

The true difference between the Deactivated mode FTP tests was 2%.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**From:** Mazaitis, Vincent [mailto:mazaitis.vincent@epa.gov]  
**Sent:** Friday, April 11, 2014 7:04 AM  
**To:** Giles, Michael (EEO); Rodgers, William (EEO)  
**Cc:** Snyder, Jim  
**Subject:** FAUE-DAQ

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thank You,

Vincent Mazaitis

(734)214-4864

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Snyder, Jim[Snyder.Jim@epa.gov]; Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Mazaitis, Vincent  
**Sent:** Fri 4/11/2014 1:12:17 PM  
**Subject:** RE: Audi A8 AUE-DAQ

Thanks Bill! Will do.

Have a great weekend!

Vince Mazaitis

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Friday, April 11, 2014 9:09 AM  
**To:** Mazaitis, Vincent  
**Cc:** Snyder, Jim; Giles, Michael (EEO); Allen, Gregory (EEO)  
**Subject:** Audi A8 AUE-DAQ

Hello Vince,

We accept the results of the recent confirmatory tests. Please release the car for pick up on Monday morning.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Wed 4/9/2014 8:53:35 PM  
**Subject:** VW Group - Revised/New Certificate Requests  
VGA RC01-14 EPA Letter.pdf

Hello Jim,

I submitted a Certificate Lock Request for Test group/Evap family  
FVGAV02.0AUA/FVGAR0110AAA.

I also submitted a Certification Request for the new Test group/Evap family combination  
FVGAV02.0AUA/FVGAR0125VAT.

Both requests are related to the Running Change RC\_FV2.0AUA\_01\_14 to add a new EDV and  
FEDV models, of which the revised Certification Application, including the attached letter, was  
uploaded to Verify.

Please let me know if you have questions.

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

Leonard W. Kata Name  
Manager Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
leonard.kata@vw.com E-Mail

April 9, 2014 Date

Subject: Running Change for MY 2015 Volkswagen Group Test Group  
FVGAV02.0AUA

Dear Mr. Snyder,

We are submitting the attached Running Change information to add new models to the Test Group FVGAV02.0AUA. A revised Certification Application has been uploaded to the Verify system for issuance of a revised Certificate of Conformity

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

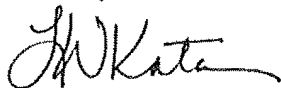
Copies of the Certification Fee filing form and OBD approval letter are contained in sections 15 and 16 of the included electronic application.

All vehicles within this test group comply with all applicable regulations contained in 40 CFR Part 86 and the compliance statements contained in sections 8 and 14.

This submission constitutes our final application and the request for issuance of a Certificate of Conformity.

If you have any questions with regard to this information please contact our office in Auburn Hills at (248) 754-4224 or (248) 754-4219.

Sincerely,



Leonard W. Kata  
Volkswagen Group of America, Inc.

Engineering and Environmental Office

Enclosure(s)

# Ex. 4 - CBI

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Wed 4/9/2014 6:39:17 PM  
**Subject:** VW Group - Audi Decision Information submission

Hi Jim,

I wanted to bring to your attention that we made a change to the Test data and Vehicle Information data related to the recently submitted Decision Information for VID: FAUA-S3Q (Audi S3). This vehicle was tested on a 2-wheel drive dyno, not a 4wd dyno.

This test car represents the new Audi S3 with (Bin 5) 2.0L turbo, a 292 horse power performance variant of the existing A3 Sedan quattro and VW GTI models.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219



**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]; Glas, Tobias[Tobias.Glas@vw.com]; Mazaitis, Vincent[mazaitis.vincent@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Tue 4/8/2014 11:08:57 AM  
**Subject:** Audi A8 Confirmatory Test

Hello Jim,

When delivering the Audi A8 yesterday we discussed with Ben that it would be good to run the first set of tests tomorrow as FTP and US06 with the Start/Stop system activated. This way if something happens that might cause the system not to function, we save schedule time by not losing those tests. We also stressed that this car requires the hood latches be closed, the system switch turned on and driver's seat belt to be buckled in order for the system to function.

Also we would again like to witness the start of the first US06 test to observe the cooling fan placement if at all possible.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Snyder, Jim[Snyder.Jim@epa.gov]; Haynes, Ben[haynes.ben@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Thomas, Richard (EEO)[Richard.Thomas@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Giles, Michael (EEO)  
**Sent:** Mon 4/7/2014 4:41:35 PM  
**Subject:** RE: FAUA-Q3F Supplemental Information Loaded

Hello Jim and Ben,

Can you let us know when you expect to have the confirmed test date for the vehicle below?

Thanks

Mike

**From:** Allen, Gregory (EEO)  
**Sent:** Friday, April 04, 2014 2:33 PM  
**To:** snyder.jim@epa.gov; Ben Haynes (Haynes.ben@Epa.gov)  
**Cc:** Rodgers, William (EEO); Giles, Michael (EEO); Thomas, Richard (EEO)  
**Subject:** FAUA-Q3F Supplemental Information Loaded

Hello Jim,

The supplemental information has been uploaded for test vehicle FAUA-Q3F / 0.

Can you please arrange a confirmatory test date of Monday May 5<sup>th</sup> for the following vehicle.

Model Year = 2015

Manufacturer Code = VGA

**Ex. 6** (Audi Q3 FWD with 2.0l gasoline engine)

Configuration # = 0

Given the tight product launch timing for this model, it would be greatly appreciated you could confirm this test date as soon as possible to avoid vehicle shipping delays from Germany.

Please contact me if you have any questions or concerns.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Snyder, Jim[Snyder.Jim@epa.gov]; Haynes, Ben[haynes.ben@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]; Thomas, Richard (EEO)[Richard.Thomas@vw.com]  
**From:** Allen, Gregory (EEO)  
**Sent:** Fri 4/4/2014 6:32:43 PM  
**Subject:** FAUA-Q3F Supplemental Information Loaded

Hello Jim,

The supplemental information has been uploaded for test vehicle FAUA-Q3F / 0.

Can you please arrange a confirmatory test date of Monday May 5<sup>th</sup> for the following vehicle.

Model Year = 2015

Manufacturer Code = VGA

Ex. 6 (Audi Q3 FWD with 2.0l gasoline engine)

Configuration # = 0

Given the tight product launch timing for this model, it would be greatly appreciated you could confirm this test date as soon as possible to avoid vehicle shipping delays from Germany.

Please contact me if you have any questions or concerns.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

To: [Ex. 7]@vw.com]  
Cc: [Ex. 7]@vw.com]; [Ex. 7]@vw.com]; Snyder, Jim[Snyder.Jim@epa.gov]; Verify Help Desk[verifyhelp@csc.com]; [Ex. 7]@vw.com]  
From: [Ex. 6]  
Sent: Fri 4/4/2014 5:02:44 PM  
Subject: Re: VW Group - Email Problem for Confirmatory Test Selected Vehicles (HLP-5097)

Hello [Ex. 7]

Verify help desk ticket HLP-5097 was opened for your inquiry. Unfortunately, we can not resend the notification. This notification issue is documented in Verify-15481 the fix for which will be deployed in a future release.

Until this issue is fixed you could request a Decision Information Request Dataset Report to see if your vehicle has been selected for confirmatory testing. The report will indicate an ok status if your vehicle has been selected. Please note; however, the report will return an error if the decision status is deleted, waived or completed.

[Ex. 6]

Verify Help Desk  
Staffed by Computer Sciences Corporation,  
Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

To Verify Help Desk@CSC

cc

[Ex. 7]

04/04/2014 10:39 AM

[Ex. 7]

Subject VW Group - Email Problem for Confirmatory Test Selected Vehicles

[Ex. 6]

Yesterday we submitted Decision Information for confirmatory testing for two vehicles.

One vehicle was selected for confirmatory testing, as we learned during discussion with Jim Snyder. However, no email notification was received. A second vehicle which was submitted at the same time (but was waived), resulted in the expected email notification of waiver.

To summarize, the problem is that the notification emails for selected vehicles are not being received for the submitted or other colleagues who are configured in VGA to receive confirmatory notifications.

Please initiate corrective action for this issue as it causes significant delays to our certification process.

Also , if it is possible to forward to us the missing email information, it would be greatly appreciated.

Background information:

User: mgilesvga,

Mfr: VGA,

Ex. 6

Configuration: 0

Thank you,

**Ex. 7**

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone:

Fax:

mailto:

**Ex. 7**

**To:** Verify Help Desk[verifyhelp@csc.com]  
**Cc:** [Ex. 7]@vw.com]; [Ex. 7]@vw.com];  
[Ex. 7]@vw.com];  
Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** [Ex. 7]  
**Sent:** Fri 4/4/2014 2:39:06 PM  
**Subject:** VW Group - Email Problem for Confirmatory Test Selected Vehicles

Hello Vince,

Yesterday we submitted Decision Information for confirmatory testing for two vehicles.

One vehicle was selected for confirmatory testing, as we learned during discussion with Jim Snyder. However, no email notification was received. A second vehicle which was submitted at the same time (but was waived), resulted in the expected email notification of waiver.

To summarize, the problem is that the notification emails for selected vehicles are not being received for the submitted or other colleagues who are configured in VGA to receive confirmatory notifications.

Please initiate corrective action for this issue as it causes significant delays to our certification process.

Also , if it is possible to forward to us the missing email information, it would be greatly appreciated.

Background information:

User: [Ex. 6]

Mfr: [Ex. 6]

Vehicle ID: [Ex. 6]



Configuration: 0

Thank you,

**Ex. 7**

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone:

Fax:

mailto:

**Ex. 7**

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Giles, Michael (EEO)  
**Sent:** Thur 4/3/2014 6:17:30 PM  
**Subject:** VW - Engine information

Hello Jim,

I tried to call to clarify one point from our previous discussion regarding engines:

The Q3 (2wd) is similar vehicle as the Tiguan and uses the same **existing engine**:

- Same engine code CCTA (existing for some years).
- Same ETW
- Improvement is in the RLHP

The S3 carline, which we will submit as an FEDV in the next few days, is the only vehicle of the new models (Q3, S3, Golf R) using a new engine code.

I wanted to clarify this detail in case it is a basis for the confirmatory decision for the Q3.

Regards,

Mike

Michael Giles

Certification Engineer

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4229

Fax: 248 754 4207

mailto: [Michael.Giles@VW.com](mailto:Michael.Giles@VW.com)

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Allen, Gregory[Gregory.Allen@vw.com]; Thomas, Richard (EEO)[Richard.Thomas@vw.com]; Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Giles, Michael (EEO)  
**Sent:** Tue 4/1/2014 1:31:21 PM  
**Subject:** VW Group - Decision Information for Q3 + Q3 quattro

Hello Jim,

Today we uploaded two decision requests for new carlines in MY 2015 test group FVGAV02.0AUA (both with automatic transmission):

<b>Carline</b>	<b>Vehicle + configuration</b>	<b>Purpose</b>
Q3 quattro exhaust vehicle for test group	FAUA-Q3Q 0	EDV – New carline and new worst case
Q3	FAUA-Q3F 0	FEDV - New carline (2WD)

Note - If not selected, the Q3 (2WD) will require a manufacturer confirmatory Highway test due to high FE for weight class.

We plan to submit a running change and revised application to reflect the new carlines. In addition, we plan to include a third new carline (Audi S3) along with tests as an FEDV. We expect to submit those fuel economy tests for the S3 in the next week or so, as well as the complete running change.

Please advise of the confirmatory decision or call me if there are any questions.

Michael Giles

Certification Engineer – EEO

VW Group of America

(248) 754-4229

**From:** Snyder, Jim

**Required Attendees:** Wehrly, Linc; Wright, DavidA; Ott, Franz; Dalton, Joel; French, Roberts; Ex. 7 Good, David

**Optional Attendees:** Ex. 7

**Location:** AA-Room-Office-N66-ConfRoom/AA-OTAQ-OFFICE

**Importance:** Normal

**Subject:** VW PHEV label calculation and BEV testing

**Start Date/Time:** Thur 7/10/2014 1:30:00 PM

**End Date/Time:** Thur 7/10/2014 2:30:00 PM

2015 PHEV calculations Berechnungsvorlage 02.pptx

**To:** robert.martell@vw.com[robert.martell@vw.com]; mark.mcnab@vw.com[mark.mcnab@vw.com]; michael.horn@vw.com[michael.horn@vw.com]; Sturgell, Gregory[Sturgell.Gregory@epa.gov]; Blubaugh, Jim[Blubaugh.Jim@epa.gov]; Dickinson, David[Dickinson.David@epa.gov]; Wehrly, Linc[wehrly.linc@epa.gov]; Ann Krinard[akrinard@gmail.com]  
**From:** Ex. 6  
**Sent:** Sun 9/27/2015 9:56:03 PM  
**Subject:** REQUEST EPA COMPLIANT CAR

RE: TRADE-IN of 2012 VW Jetta Sportwagen Diesel with compromised emissions.

Hello to All Concerned:

First of All, I love my car. I'm sorry that VW has compromised my trust. I have owned many VW's over my life and I want to own one that does not spew as many toxins as my current car.

We purchased a "Clean Diesel" VW Jetta Sportwagen Diesel 2012 new. Current mileage 25,690 approximately. A 2015 scandal determined that car does not meet EPA standards for Nox emissions.

**Request trade-in** for VW Golf SportWagen with AdBlue System to resolve this situation. I am a conscientious person who does not want to do more harm to the environment by continuing to drive my car. This is a simple solution to keep more emissions out of our air.

Thank you for your time and consideration.

Ex. 6

**From:** Tamborra, Nick (EEO)  
**Location:** AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** Accepted: FW: VW phone conference: discuss off-cycle GHG credits  
**Start Date/Time:** Mon 3/31/2014 5:00:00 PM  
**End Date/Time:** Mon 3/31/2014 6:00:00 PM



**From:** Schmidt, Oliver (EEO)  
**Location:** AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** Accepted: FW: VW phone conference: discuss off-cycle GHG credits  
**Start Date/Time:** Mon 3/31/2014 5:00:00 PM  
**End Date/Time:** Mon 3/31/2014 6:00:00 PM

**From:** Ex. 7  
**Location:** AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** Accepted: VW phone conference: discuss off-cycle GHG credits  
**Start Date/Time:** Mon 3/31/2014 5:00:00 PM  
**End Date/Time:** Mon 3/31/2014 6:00:00 PM

;

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Ex. 7  
**Sent:** Fri 3/21/2014 5:17:14 PM  
**Subject:** RE: Off-Cycle Credits

Hi Jim:

Thanks for setting this up. Two or three of us from VW will call in so I will arrange the call-in number. Hope that you're feeling better.

Regards,

Ex. 7

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Friday, March 21, 2014 1:13 PM  
**To:** Ex. 7  
**Subject:** RE: Off-Cycle Credits

Ex. 7 Sorry I was out sick a couple days. I scheduled a room for 1:00 on Monday. Can you arrange a conference call #?

Jim

**From:** Ex. 7 @vw.com]  
**Sent:** Thursday, March 20, 2014 1:48 PM  
**To:** Snyder, Jim  
**Subject:** RE: Off-Cycle Credits  
**Importance:** High

Hello Jim:

Have you had any success setting up this meeting? Once again, tomorrow afternoon would work for us. Preferably early afternoon. It should take less than one hour. Monday after 11:00 a.m. would be our next chance.

Best regards,

Ex. 7

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: Ex. 7

Cell: Ex. 7

E-Mail: Ex. 7

**From:** Kata, Leonard (EEO)  
**Sent:** Wednesday, March 19, 2014 8:49 AM  
**To:** 'Snyder, Jim'  
**Subject:** RE: Off-Cycle Credits  
**Importance:** High

Hello Jim:

Our Friday morning is booked, but anytime Friday after 12:30 p.m. would work.

Regards,

Ex. 7

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Tuesday, March 18, 2014 5:45 PM  
**To:** Ex. 7  
**Subject:** RE: Off-Cycle Credits

Ex. 7 Linc won't be in this Thursday. We could do something Friday, Monday or Next Thursday afternoon. The rest of next week is actually pretty crowded.

Jim

**From:** Ex. 7 [mailto:Ex. 7@vw.com]  
**Sent:** Monday, March 17, 2014 11:11 AM  
**To:** Snyder, Jim  
**Cc:** Ex. 7  
**Subject:** RE: Off-Cycle Credits  
**Importance:** High

Hello Jim:

I would like to try again to schedule a VW/EPA conference call to have a preliminary discussion regarding off-cycle GHG credits. If possible, we would like to do this within the next few days. I have meetings tomorrow and Wednesday mornings at 0900-1030. Do you have an opening in your schedule that would work?

Best regards,

**Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: **Ex. 7**

Cell: **Ex. 7**

E-Mail: **Ex. 7**

---

**From:** **Ex. 7**  
**Sent:** Monday, March 10, 2014 3:00 PM  
**To:** 'Snyder, Jim'  
**Cc:** **Ex. 7** (@vw.com)  
**Subject:** RE: Off-Cycle Credits

Hello Jim:

Thanks for the response. Unfortunately, Thursday morning (03/13/14) doesn't work for us. Since this call does not involve our German colleagues, afternoons are okay. Would a call on Wednesday (03/12/14) after 3:00 p.m. or Thursday (03/13/14) after 2:00 p.m. work?

Best regards,

Ex. 7

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: Ex. 7

Cell: Ex. 7

E-Mail: Ex. 7

-----Original Appointment-----

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]

**Sent:** Friday, March 07, 2014 4:01 PM

To: Ex. 7

**Subject:** New Time Proposed: Off-Cycle Credits

**When:** Tuesday, March 11, 2014 10:00 AM-11:00 AM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Online Meeting

Ex. 7 We already have mtgs from 10 to 12 on Tuesday. Wed morning too but Thursday morning is open. Afternoons are available too if its just us but I assume there may be German call-ins?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

-----  
New Meeting Time Proposed:

Thursday, March 13, 2014 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).



**To:** Stump, Barbara[Stump.Barbara@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Thomas, Richard (EEO)  
**Sent:** Tue 3/18/2014 1:26:47 PM  
**Subject:** FW: 2015 Lamborghini Huracan EPA FEE Filing Form  
2015 EPA Cert Fees FVGAV05.2NLE to EPA.pdf

Hi Barbara;

I didn't get any confirmation for this payment and the Lamborghini model test group below.  
Could you please look into this and confirm that the payment was received?

Thanks,

Richard

**From:** Thomas, Richard (EEO)  
**Sent:** Monday, March 10, 2014 1:19 PM  
**To:** EPA Certification Fee Filing Forms (fees@epa.gov)  
**Cc:** Stump, Barbara (Stump.Barbara@epa.gov)  
**Subject:** 2015 Lamborghini Huracan EPA FEE Filing Form

Please find attached the EPA Fee Filing form for Lamborghini Huracan test group  
FVGAV05.2NLE, the fee amount of \$28,528 was paid today and will be available in the EPA  
account by the middle of this week.

If you have any questions, please contact me directly.

*Richard E. Thomas*  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Engineering and Environmental Office (EEO)

Phone: 248 754-4213

Fax: 248 754-4207

[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)



U.S. Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
**On-Highway Fee Filing Form**

For Certification Applications Received In Calendar Year 2014

Manufacturer Name VOLKSWAGEN Group of America, Inc.

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48326

On-Highway Certification Request Type (check one)

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) <b>FEDERAL</b> (\$28,528) | <input type="checkbox"/> HDV EVAP-ONLY (\$563)      |
| <input type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) <b>CAL-ONLY</b> (\$15,077)           | <input type="checkbox"/> HDE CALIF-ONLY (\$563)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) <b>FEDERAL</b> (\$38,464)                     | <input type="checkbox"/> MOTORCYCLE (\$1,717)       |
|   | <input type="checkbox"/> LD/MDPV/HDV ICI (\$88,591) |

EPA standard family or test group:

F	V	G	A	V	0	5	.	2	N	L	E
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Amount paid (U.S. Funds Only):

\$ 28,528.00

Enter the check number, or the statement "WIRE" or "ACH":

EFT

Reduced Fee Section (40 CFR §1027.120)

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/units covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/units: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


Company Representative: Richard E. Thomas Signature: **Ex. 6**

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 02/26/2014

E-mail Address: Richard.Thomas@VW.com

**Submission of payments and forms:**

- (1) Online: **Forms** may be found and submitted with or without **payments** online at [www.Pay.gov](http://www.Pay.gov).
- (2) By mail: For check payments only, send **checks** and this **form** to:

Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
P.O. Box 979032  
St. Louis, MO 63197-9000

- (3) Transmit offline Wire **payments** to the New York Federal Reserve Bank. (See Instructions, p.2)
- (4) Transmit offline ACH **payments** to the Federal Reserve Bank of Cleveland. (Instructions, p.2)
- (5) **Forms** not submitted under (1) and (2) above can be sent as email attachments to [Fees@epa.gov](mailto:Fees@epa.gov). Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

This form expires: 10/31/2016

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** [Ex. 7]@vw.com]  
**From:** [Ex. 7]  
**Sent:** Mon 3/17/2014 3:11:18 PM  
**Subject:** RE: Off-Cycle Credits

Hello Jim:

I would like to try again to schedule a VW/EPA conference call to have a preliminary discussion regarding off-cycle GHG credits. If possible, we would like to do this within the next few days. I have meetings tomorrow and Wednesday mornings at 0900-1030. Do you have an opening in your schedule that would work?

Best regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office  
Volkswagen Group of America, Inc.

Phone: [Ex. 7]

Cell: [Ex. 7]

E-Mail: [Ex. 7]

---

**From:** [Ex. 7]  
**Sent:** Monday, March 10, 2014 3:00 PM  
**To:** 'Snyder, Jim'  
**Cc:** [Ex. 7]@vw.com)  
**Subject:** RE: Off-Cycle Credits

Hello Jim:

Thanks for the response. Unfortunately, Thursday morning (03/13/14) doesn't work for us. Since this call does not involve our German colleagues, afternoons are okay. Would a call on Wednesday (03/12/14) after 3:00 p.m. or Thursday (03/13/14) after 2:00 p.m. work?

Best regards,

[Ex. 7]

---

## Ex. 7

Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.

Phone: Ex. 7

Cell: Ex. 7

E-Mail: Ex. 7

-----Original Appointment-----

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]

**Sent:** Friday, March 07, 2014 4:01 PM

**To:** Ex. 7

**Subject:** New Time Proposed: Off-Cycle Credits

**When:** Tuesday, March 11, 2014 10:00 AM-11:00 AM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Online Meeting

Ex. 7 We already have mtgs from 10 to 12 on Tuesday. Wed morning too but Thursday morning is open. Afternoons are available too if its just us but I assume there may be German call-ins?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

-----  
New Meeting Time Proposed:

Thursday, March 13, 2014 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** [Ex. 7]@vw.com]  
**From:** [Ex. 7]  
**Sent:** Mon 3/10/2014 7:00:01 PM  
**Subject:** RE: Off-Cycle Credits

Hello Jim:

Thanks for the response. Unfortunately, Thursday morning (03/13/14) doesn't work for us. Since this call does not involve our German colleagues, afternoons are okay. Would a call on Wednesday (03/12/14) after 3:00 p.m. or Thursday (03/13/14) after 2:00 p.m. work?

Best regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office  
Volkswagen Group of America, Inc.

Phone: [Ex. 7]

Cell: [Ex. 7]

E-Mail: [Ex. 7]

-----Original Appointment-----

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]

**Sent:** Friday, March 07, 2014 4:01 PM

**To:** [Ex. 7]

**Subject:** New Time Proposed: Off-Cycle Credits

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**Where:** Online Meeting

[Ex. 7] We already have mtgs from 10 to 12 on Tuesday. Wed morning too but Thursday morning is open. Afternoons are available too if its just us but I assume there may be German call-ins?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

-----  
New Meeting Time Proposed:

Thursday, March 13, 2014 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Allen, Gregory[Gregory.Allen@vw.com]; Thomas, Richard (EEO)[Richard.Thomas@vw.com]  
**From:** Giles, Michael (EEO)  
**Sent:** Fri 3/7/2014 10:11:06 PM  
**Subject:** RE: VW Request - Cert Request Rejection FVGAV06.3VUM / FVGAR0155VAM

Thanks Jim,

We have made the test data corrections.

I re-submitted the certificate request, so it should be back in your work flow.

Regards,

Mike

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Friday, March 07, 2014 3:33 PM  
**To:** Giles, Michael (EEO); Wright, DavidA  
**Cc:** Rodgers, William (EEO); Allen, Gregory; Thomas, Richard (EEO)  
**Subject:** RE: VW Request - Cert Request Rejection FVGAV06.3VUM / FVGAR0155VAM

Done.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)



**From:** Giles, Michael (EEO) [<mailto:michael.giles@vw.com>]  
**Sent:** Friday, March 07, 2014 8:45 AM  
**To:** Wright, DavidA  
**Cc:** Snyder, Jim; Rodgers, William (EEO); Allen, Gregory; Thomas, Richard (EEO)  
**Subject:** VW Request - Cert Request Rejection FVGAV06.3VUM / FVGAR0155VAM

Hello David,

This is a follow up to my voice message. We are requesting that you reject a recent certificate request we submitted for test group / evap family Ex. 4 - CBI The certificate request was submitted on March 5<sup>TH</sup> under Manufacturer code VGA.

Once this is done, we will be able to make some corrections to related test data. Once the corrections are made we will re-submit the cert request.

Please let us know if you can help with this.

Regards,

Mike

Michael Giles

Certification Engineer – EEO

VW Group of America

(248) 754-4229

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Giles, Michael (EEO)  
**Sent:** Fri 3/7/2014 8:38:20 PM  
**Subject:** RE: VW Request - Cert Request Rejection

Ex. 4 - CBI

Thanks Jim – didn't realize you were back already.

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Friday, March 07, 2014 3:33 PM  
**To:** Giles, Michael (EEO); Wright, DavidA  
**Cc:** Rodgers, William (EEO); Allen, Gregory; Thomas, Richard (EEO)  
**Subject:** RE: VW Request - Cert Request Rejection

Ex. 4 - CBI

Done.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Giles, Michael (EEO) [mailto:michael.giles@vw.com]  
**Sent:** Friday, March 07, 2014 8:45 AM  
**To:** Wright, DavidA  
**Cc:** Snyder, Jim; Rodgers, William (EEO); Allen, Gregory; Thomas, Richard (EEO)  
**Subject:** VW Request - Cert Request Rejection

Ex. 4 - CBI

Hello David,

This is a follow up to my voice message. We are requesting that you reject a recent certificate request we submitted for test group / evap family. The certificate request was submitted on March 5<sup>TH</sup> under Manufacturer code VGA.

Ex. 4 - CBI

Once this is done, we will be able to make some corrections to related test data. Once the corrections are made we will re-submit the cert request.

Please let us know if you can help with this.

Regards,

Mike

Michael Giles

Certification Engineer – EEO

VW Group of America

(248) 754-4229

**To:** Wright, DavidA[Wright.DavidA@epa.gov]  
**Cc:** Snyder, Jim[Snyder.Jim@epa.gov]; Rodgers, William (EEO)[William.Rodgers@vw.com]; Allen, Gregory[Gregory.Allen@vw.com]; Thomas, Richard (EEO)[Richard.Thomas@vw.com]  
**From:** Giles, Michael (EEO)  
**Sent:** Fri 3/7/2014 1:45:05 PM  
**Subject:** VW Request - Cert Request Rejection [Ex. 4 - CBI]

Hello David,

This is a follow up to my voice message. We are requesting that you reject a recent certificate request we submitted for test group / evap family [Ex. 4 - CBI] The certificate request was submitted on March 5<sup>TH</sup> under Manufacturer code VGA.

Once this is done, we will be able to make some corrections to related test data. Once the corrections are made we will re-submit the cert request.

Please let us know if you can help with this.

Regards,

Mike

Michael Giles

Certification Engineer – EEO

VW Group of America

(248) 754-4229

**To:** Wright, DavidA[Wright.DavidA@epa.gov]; Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Allen, Gregory[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Mon 3/3/2014 2:18:32 PM  
**Subject:** RE: VW Group Decision Information for Audi A8 3.0l

David,

The Supplemental Information has been submitted. Thanks.

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**From:** Wright, DavidA [mailto:Wright.DavidA@epa.gov]  
**Sent:** Friday, February 28, 2014 4:25 PM  
**To:** Rodgers, William (EEO); Snyder, Jim  
**Cc:** Allen, Gregory; Giles, Michael (EEO)  
**Subject:** RE: VW Group Decision Information for Audi A8 3.0l

I have requested this vehicle be confirmatory tested and VW should be receiving a notification from Verify shortly. The vehicle will be scheduled for testing once the supplemental information has been submitted. I will be in the office all next week, please do not hesitate to contact me if you need any further assistance.

Regards,

David

David A. Wright

Light-Duty Vehicle Center, Compliance Division

National Vehicle and Fuel Emissions Laboratory

Phone: (734) 214-4467

E-mail: [wright.davida@epa.gov](mailto:wright.davida@epa.gov)

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]

**Sent:** Friday, February 28, 2014 3:42 PM

**To:** Snyder, Jim; Wright, DavidA

**Cc:** Allen, Gregory; Giles, Michael (EEO)

**Subject:** VW Group Decision Information for Audi A8 3.0l

Hello David,

In Jim Snyder's absence, most of next week, can you please arrange a confirmatory test date of Monday April 7<sup>th</sup> for the following vehicle. We recently completed the submission of test data and related decision information into Verify. It is our understanding that Jim wants to confirm the FTP, HWY and US06 cycles for this vehicle.

Model Year = 2015

Manufacturer Code = VGA

**Ex. 4 - CBI** (Audi A8 with 3.0l gasoline engine)



Configuration # = 0

Given the tight product launch timing for this model, it would be greatly appreciated you could confirm this test date as soon as possible to avoid vehicle shipping delays from Germany.

Please contact me if you have any questions or concerns.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Allen, Gregory[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Wright, DavidA  
**Sent:** Fri 2/28/2014 9:25:11 PM  
**Subject:** RE: VW Group Decision Information for Audi A8 3.0l

I have requested this vehicle be confirmatory tested and VW should be receiving a notification from Verify shortly. The vehicle will be scheduled for testing once the supplemental information has been submitted. I will be in the office all next week, please do not hesitate to contact me if you need any further assistance.

Regards,

David

David A. Wright

Light-Duty Vehicle Center, Compliance Division

National Vehicle and Fuel Emissions Laboratory

Phone: (734) 214-4467

E-mail: wright.davida@epa.gov

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Friday, February 28, 2014 3:42 PM  
**To:** Snyder, Jim; Wright, DavidA  
**Cc:** Allen, Gregory; Giles, Michael (EEO)  
**Subject:** VW Group Decision Information for Audi A8 3.0l

Hello David,

In Jim Snyder's absence, most of next week, can you please arrange a confirmatory test date of Monday April 7<sup>th</sup> for the following vehicle. We recently completed the submission of test data and related decision information into Verify. It is our understanding that Jim wants to confirm the FTP, HWY and US06 cycles for this vehicle.

Model Year = 2015

Manufacturer Code = VGA

**Ex. 4 - CBI** (Audi A8 with 3.0l gasoline engine)

Configuration # = 0

Given the tight product launch timing for this model, it would be greatly appreciated you could confirm this test date as soon as possible to avoid vehicle shipping delays from Germany.

Please contact me if you have any questions or concerns.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



**To:** Snyder, Jim[Snyder.Jim@epa.gov]; Wright, DavidA[Wright.DavidA@epa.gov]  
**Cc:** Allen, Gregory[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Fri 2/28/2014 8:41:39 PM  
**Subject:** VW Group Decision Information for Audi A8 3.0l

Hello David,

In Jim Snyder's absence, most of next week, can you please arrange a confirmatory test date of Monday April 7<sup>th</sup> for the following vehicle. We recently completed the submission of test data and related decision information into Verify. It is our understanding that Jim wants to confirm the FTP, HWY and US06 cycles for this vehicle.

Model Year = 2015

Manufacturer Code = VGA

**Ex. 4 - CBI** (Audi A8 with 3.0l gasoline engine)

Configuration # = 0

Given the tight product launch timing for this model, it would be greatly appreciated you could confirm this test date as soon as possible to avoid vehicle shipping delays from Germany.

Please contact me if you have any questions or concerns.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Allen, Gregory[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Thur 2/27/2014 6:18:40 PM  
**Subject:** Decision information

Hello Jim,

I wanted to let you know that I submitted two decision information files yesterday regarding the 2015 Lamborghini Gallardo replacement called the Huracan and Huracan Spyder. Please let us know if you plan to confirm these models.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Mon 2/24/2014 12:53:18 PM  
**Subject:** Cooling fans

Hello Jim,

I received a question from one of our factories about whether EPA is still planning to install new fans in the labs. Can you let me know if so and possible provide photos?

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Fri 2/21/2014 4:27:09 PM  
**Subject:** RE: 2015 SCR AECD Approval

Thanks

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Thursday, February 20, 2014 3:10 PM  
**To:** Rodgers, William (EEO)  
**Subject:** 2015 SCR AECD Approval

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Fri 2/21/2014 4:13:55 PM  
**Subject:** RE: cert fees not paid yet

Jim,

I was told they were paid today (probably last night), instead of Wednesday as planned.

Thanks,

Bill

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Thursday, February 20, 2014 3:27 PM  
**To:** Rodgers, William (EEO)  
**Cc:** Stump, Barbara  
**Subject:** cert fees not paid yet

Bill, I approved one certificate but the fees haven't been logged in for the other two. If this is a rush we can give Barbara a heads up, otherwise I'm guessing they will probably appear by Monday.



Motor

For Certification

Manufacturer Name VOLKSWAGEN

Address 3800 Ha

City/State/Zip Code/Country Au

On-Highway

☒ LDV/LDT/MDPV/HDV (Chassis ce

☐ LDV/LDT/MDPV/HDV (Chassis ce

☐ HDE (Engine Dyno cert) FEDER

EPA standard family or test group:

Amount paid (U.S. Funds Only):

Enter the check number, or the state

Reduc

Reduced fee calculation (minimum ini  
Aggregate retail sales price of the  
Check box if an Independent Commerci

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U.S.  
Motor Vehicle

For Certification

Manufacturer Name VOLKSWAGEN Group

Address 3800 Hamlin

City/State/Zip Code/Country Auburn

On-Highway Certification

- ☒ LDV/LDT/MDPV/HDV (Chassis cert)  
☐ LDV/LDT/MDPV/HDV (Chassis cert)  
☐ HDE (Engine Dyno cert) FEDERAL

EPA standard family or test group:

Amount paid (U.S. Funds Only):

Enter the check number, or the statement

Reduced

Reduced fee calculation (minimum initial  
 Aggregate retail sales price of the vehicle)  
 Check box if an Independent Commercial

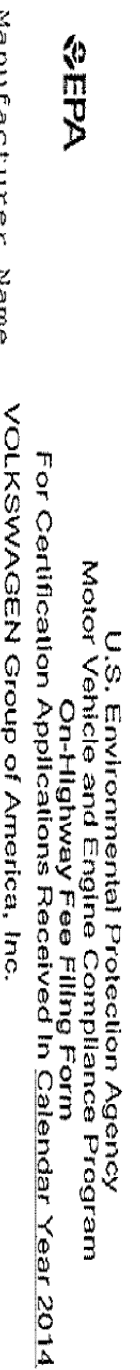
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Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)



Manufacturer Name VOLKSWAGEN Group of America, Inc.  
Address 3800 Hamlin Road  
City/State/Zip Code/Country Auburn Hills, MI 48326

## On-Highway Certification Request (Type (check one))

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Lbv/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$28,528) | <input type="checkbox"/> HDV EVAP-ONLY (\$563)      |
| <input type="checkbox"/> Lbv/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$15,077)           | <input type="checkbox"/> HDE CALIF-ONLY (\$563)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$38,464)                     | <input type="checkbox"/> MOTORCYCLE (\$1,717)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$88,591) |

EPA standard family or test group:

F	V	G	A	T	0	3	.	0	N	U	3
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Amount paid (U.S. Funds Only) ::

**\$ 28,528.00**

Enter the check number, or the statement "WIRE" or "ACH":

EFT

Reduced Fee Section (40 CFR 51027.120)

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/units covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/units: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:

Company Representative: **Richard E. Thomas**

Signature:

Title: **Emission Cert Strategist** Phone/Fax: **248 754 4213** / **248 754 4207** Date: **02 / 12 / 2014**

E-mail Address: [Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

(1) Online: Forms may be found and submitted with or without payments online at [www.Pay.gov](http://www.Pay.gov).  
(2) By mail: For check payments only, send checks and this form to:

Environmental Protection Agency  
Vehicle and Engine Compliance Program

(3) Transmit offline wire payments to the New York Federal Reserve Bank. (See Instructions, p.2)  
(4) Transmit offline ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2)  
(5) Forms not submitted under (1) and (2) above can be sent as email attachments to [fees@epa.gov](mailto:fees@epa.gov). Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

# Ex. 6



**U.S. Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program**

**On-Highway Fee Filing Form**  
For Certification Applications Received in Calendar Year 2014

**VOLKSWAGEN Group of America, Inc.**

Manufacturer Name

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48326

**On-Highway Certification Request Type (check one)**

☒ LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$28,528) ☐ HDV EVAP-ONLY (\$563)

☐ LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$15,077) ☐ HDV CALIF-ONLY (\$563)

☐ HDV (Engine Dyno cert) FEDERAL (\$38,464) ☐ MOTORCYCLE (\$1,717)

☐ LD/MDPV/HDV ICI (\$88,591)

EPA standard family or test group:

F V G A T 0 3 . 0 N U 2

Amount paid (U.S. Funds Only):

\$28,528.00

Enter the check number, or the statement "WIRE" or "ACH":

EFT

**Reduced Fee Section (40 CFR \$1027.120)**

Aggregate retail sales price of the vehicles/units: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


**EX. 6**

Company Representative: Richard E. Thomas

Signature:

Title: Emission Cert Strategist Phone/Fax: 248 764 4213 / 248 764 4207 Date: 02 / 12 / 2014

E-mail Address: Richard.Thomas@VW.com

Submission of payments and forms:

(1) Online: Forms may be found and submitted with or without payments online at [www.Pay.gov](http://www.Pay.gov).

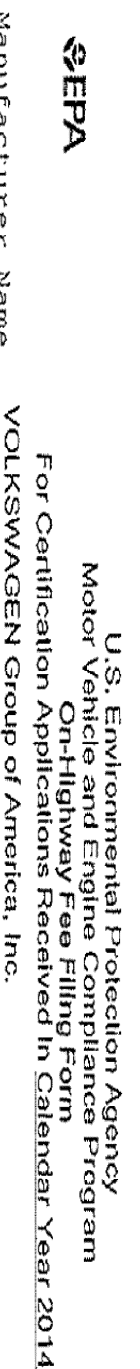
(2) By mail: For check payments only, send checks and this form to:

**Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program**  
P.O. Box 979032  
St. Louis, MO 63197-9000

(3) Transmit offline wire payments to the New York Federal Reserve Bank. (See Instructions, p.2)  
(4) Transmit offline ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2)  
(5) Forms not submitted under (1) and (2) above can be sent as email attachments to [fees@epa.gov](mailto:fees@epa.gov).  
Forms and payments sent in ways other than the above may be delayed or ineffective. See the  
Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send  
comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing  
respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S.  
Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any  
correspondence. Do not send the completed Form 3520-29 to this address.





Manufacturer Name VOLKSWAGEN Group of America, Inc.  
Address 3800 Hamlin Road  
City/State/Zip Code/Country Auburn Hills, MI 48326

## On-Highway Certification Request Type (check one)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Lbv/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$28,528) | <input type="checkbox"/> HDV EVAP-ONLY (\$563)      |
| <input type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$15,077)           | <input type="checkbox"/> HDE CALIF-ONLY (\$563)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$38,464)                     | <input type="checkbox"/> MOTORCYCLE (\$1,717)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$88,591) |

EPA standard family or test group:

F	V	G	A	T	0	3	.	0	N	U	3
---	---	---	---	---	---	---	---	---	---	---	---

Amount paid (U.S. Funds Only) ::

**\$ 28,528.00**

Enter the check number, or the statement "WIRE" or "ACH":

EFT

Reduced Fee Section (40 CFR 51027.120)  
 Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/units covered: \_\_\_\_\_  
 Aggregate retail sales price of the vehicles/units: \$ \_\_\_\_\_  
 x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:

[illegible]

# Ex. 9

Company Representative: Richard E. Thomas

Signature:

Title: **Emission Cert Strategist**      Phone/Fax: **248 754 4213** / **248 754 4207**      Date: **02 / 12 / 2014**

E-mail Address: Richard.Thomas@VW.com

(1) Online: Forms may be found and submitted with or without payments online at [www.Pay.gov](http://www.Pay.gov).  
(2) By mail: For check payments only, send checks and this form to:

Environmental Protection Agency  
Vehicle and Engine Compliance Program

(3) Transmit offline Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2)  
(4) Transmit offline ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2)  
(5) Forms not submitted under (1) and (2) above can be sent as email attachments to fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.



**U.S. Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program**

**On-Highway Fee Filing Form**  
For Certification Applications Received in Calendar Year 2014

**VOLKSWAGEN Group of America, Inc.**

Manufacturer Name

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48326

**On-Highway Certification Request Type (check one)**

☒ LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$28,528) ☐ HDV EVAP-ONLY (\$563)

☐ LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$15,077) ☐ HDV CALIF-ONLY (\$563)

☐ HDV (Engine Dyno cert) FEDERAL (\$38,464) ☐ MOTORCYCLE (\$1,717)

☐ LD/MDPV/HDV ICI (\$88,591)

EPA standard family or test group:

F V G A T 0 3 . 0 N U 2

Amount paid (U.S. Funds Only):

\$28,528.00

Enter the check number, or the statement "WIRE" or "ACH":

EFT

**Reduced Fee Section (40 CFR \$1027.120)**

Aggregate retail sales price of the vehicles/units: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


Company Representative: Richard E. Thomas

Signature:

**EX. 6**

Title: Emission Cert Strategist Phone/Fax: 248 764 4213 / 248 764 4207 Date: 02 / 12 / 2014

E-mail Address: Richard.Thomas@VW.com

Submission of payments and forms:

(1) Online: Forms may be found and submitted with or without payments online at [www.Pay.gov](http://www.Pay.gov).

(2) By mail: For check payments only, send checks and this form to:

**Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program**  
P.O. Box 979032  
St. Louis, MO 63197-9000

(3) Transmit offline wire payments to the New York Federal Reserve Bank. (See Instructions, p.2)

(4) Transmit offline ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2)

(5) Forms not submitted under (1) and (2) above can be sent as email attachments to [fees@epa.gov](mailto:fees@epa.gov). Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Allen, Gregory  
**Sent:** Fri 2/14/2014 9:21:31 PM  
**Subject:** Decision Information Uploaded to Verify

Hello Jim,

A confirmatory test decision was uploaded to Verify for the MY2015 Audi A8L, Testgroup: FVGAV06.3VUM and Vehicle I.D: AU641 40848 /15.

Please let me know if you have any questions.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Kata, Leonard (EEO)[Leonard.Kata@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Fri 2/14/2014 1:20:37 PM  
**Subject:** FW: VW driver trace request. VID FAPA-AAF  
[2-20131009-04.xlsx](#)  
[2-20131009-02.xlsx](#)  
[2-20131011-03.xlsx](#)

Hello Jim,

As agreed, in exchange for EPA drive trace files you provided I have attached are the Audi A3 (VID: FAPA-AAF) drive traces conducted at our Audi factory in Ingolstadt, Germany.

Regards

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Glas, Tobias  
**Sent:** Fri 1/31/2014 9:30:22 PM  
**Subject:** Common Section

Hi Jim !

We are looking for road coefficients for a Mercedes Sprinter. Is it possible to get the Mercedes Common Sections for My 2014 from you ?

Have a nice weekend!

**Tobias Glas**

In-Use Emission Compliance Specialist

Engineering & Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone: (248) 754-4211

Cell: (248) 494-1537

Fax: (248) 754-4207

E-Mail: [Tobias.Glas@vw.com](mailto:Tobias.Glas@vw.com)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory[Gregory.Allen@vw.com]; Kata, Leonard (EEO)[Leonard.Kata@vw.com]  
**From:** Mazaitis, Vincent  
**Sent:** Fri 1/31/2014 1:19:59 PM  
**Subject:** RE: FAPA-AAF

Will do.

Thanks Bill,

Vince Mazaitis

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Friday, January 31, 2014 7:47 AM  
**To:** Snyder, Jim; Mazaitis, Vincent  
**Cc:** Giles, Michael (EEO); Allen, Gregory; Kata, Leonard (EEO)  
**Subject:** RE: FAPA-AAF

Hello Jim and Vince,

We have decided to accept the EPA test results as official. Please release the vehicle for transport pick up today Friday.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Thursday, January 30, 2014 12:20 PM  
**To:** Rodgers, William (EEO); Mazaitis, Vincent  
**Subject:** RE: FAPA-AAF

Bill, I will be offsite Friday so CC Vince on the note in case a re-test request needs to be submitted.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Thursday, January 30, 2014 11:11 AM  
**To:** Mazaitis, Vincent  
**Cc:** Snyder, Jim  
**Subject:** RE: FAPA-AAF

Thanks.

@Jim we will let you know regarding any retests tomorrow.

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Mazaitis, Vincent [<mailto:mazaitis.vincent@epa.gov>]

**Sent:** Thursday, January 30, 2014 10:07 AM

**To:** Rodgers, William (EEO)

**Cc:** Snyder, Jim

**Subject:** FAPA-AAF

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thank You,

Vincent Mazaitis

(734)214-4864





**To:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]  
**Cc:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Thur 1/30/2014 4:10:32 PM  
**Subject:** RE: FAPA-AAF

Thanks.

@Jim we will let you know regarding any retests tomorrow.

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**From:** Mazaitis, Vincent [mailto:mazaitis.vincent@epa.gov]  
**Sent:** Thursday, January 30, 2014 10:07 AM  
**To:** Rodgers, William (EEO)  
**Cc:** Snyder, Jim  
**Subject:** FAPA-AAF

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thank You,

Vincent Mazaitis

(734)214-4864


**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Mazaitis, Vincent  
**Sent:** Thur 1/30/2014 3:07:12 PM  
**Subject:** FAPA-AAF  
[FAPA-AAF\\_1-29-14.pdf](#)

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thank You,

Vincent Mazaitis

(734)214-4864

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2014-0038-004				Vehicle ID: FAPA-AAF			
<div style="display: flex; justify-content: space-between;"> <div style="width: 15%;">  </div> <div style="width: 45%;"> <b>Test Information</b>            Test Date: 1/29/2014            Key Start / Hot Soak: 08:47:13 / 10:04            Fuel Container ID: F00021            Fuel Type: 61 Tier 2 Cert Test Fuel            Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa)            Calculation Method: Gasoline            Pretest Remarks:         </div> <div style="width: 40%;">           MFR Name: Volkswagen Group of            MFR Codes: 10015 VGA            Config #: 01            Transmission: AUTO            Shift Schedule: A09980005            Beginning Odometer: 004888.0 MI            Drive Schedule: ftp3bag            Soak Period: 24.5 hours         </div> </div>							
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
<b>Phase 1</b>							
Sample	7.557	22.215	0.527	1.116	2.765		
Ambient	4.593	0.442	0.022	0.048	2.127		
Net Concentration	3.348	21.810	0.507	1.072	0.816	2.467	
Remarks:							
<b>Phase 2</b>							
Sample	4.298	3.456	0.258	0.724	2.030		
Ambient	4.488	0.554	0.022	0.048	2.118		
Net Concentration	0.053	2.931	0.238	0.679	0.026	0.025	
Remarks:							
<b>Phase 3</b>							
Sample	4.539	3.112	0.262	0.986	2.222		
Ambient	4.599	0.988	0.025	0.048	2.114		
Net Concentration	0.279	2.197	0.239	0.941	0.264	-0.006	
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.031	0.414	0.014	319.7	0.009	0.023 / 0.024	27.888
	0.001	0.088	0.010	321.3	0.000	0.000 / 0.000	27.795
	0.003	0.041	0.007	279.0	0.003	0.000 / 0.000	32.023
Weighted	0.00763	0.14275	0.01013	309.365	0.00285	(NMOG=1.04xNMHC) 0.0050 / 0.0052	
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	27.85	Dyno #: D002					
Phase 2	27.75	Inertia: 3500					
Phase 3	31.98	EPA Set Co A: 12.77					
		EPA Set Co B: 0.0896					
		EPA Set Co C: 0.01584					
Weighted	28.85	Emiss-Bench: D002					

**NVFEL Laboratory Test Data****CVS**

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2014-0038-004

Vehicle ID: FAPA-AAF

Results	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.113	1.481	0.050	1144.1	0.032	0.083	1.080
	0.003	0.341	0.040	1242.2	0.002	0.001	
	0.009	0.149	0.024	1002.0	0.010	0.000	

**Test Conditions**

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.09	29.09	29.09	
Avg Cell Temp (degF)	75.02	75.07	75.24	
Dew Point (degF)	47.09	47.20	45.14	
Specific Humidity (grains/lbm)	49.35	49.55	45.78	
NOx Corr Factor	0.8924	0.8931	0.8793	
CO2 Dilution Factor	11.978	18.486	13.581	
CFV Vmix (scf @68F)	2060.32	3531.80	2054.56	

CVS Flow Rate Avg (scfm)	244.07	243.43	243.38
--------------------------	--------	--------	--------

Fan Placement: One Fan - Up - Front

Phase Time (secs)	506.50	870.50	506.51
Distance (miles)	3.579	3.866	3.592
Bag Analysis Time (secs)	142.5	142.0	141.2

	FTP B1	FTP B2	FTP B3	FTP-W
IWR % diff	1.892	4.290	4.225	3.785
ASCR % diff	1.088	2.638	3.195	2.507
EER	0.473	0.866	0.733	0.730

**MFR Test Results**

for Procedure 21 Federal fuel 2-day exhaust (w/can load)


MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC	
10028819	0.0065	0.27	0.0012	282	0	0.0035	0.0035

Odometer	MPG	PM
4248 M	31.3	0.001

MPG is 8.49 % higher than EPA MPG

MFR Lab: Audi AG Ingolstadt

Dyno: 8  
Fuel: 61 Tier 2 Cert Gasoline

NVFEL Laboratory Test Data						CVS	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2014-0038-005		Vehicle ID: FAPA-AAF					
	Test Date: 1/29/2014		MFR Name: Volkswagen Group of				
	Key Start: 10:14:43		MFR Codes: 10015 VGA				
	Fuel Container ID: F00021		Config #: 01				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: AUTO				
	Test Procedure: 3		Shift Schedule: A09980011				
	Calculation Method: Gasoline		Beginning Odometer: 004899.0 MI				
Pretest Remarks:		Drive Schedule: hwfet_hwfet					
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	4.443	2.277	0.200	1.280	1.925		
Ambient	4.849	0.632	0.023	0.048	2.081		
Net Concentration	0.057	1.705	0.179	1.236	0.043	0.011	
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.000	0.017	0.002	191.3	0.000	0.000 / 0.000	46.711
(NMOG=1.04xNMHC)							
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	46.64	Dyno #: D002					
		Inertia: 3500					
		EPA Set Co A: 12.77					
		EPA Set Co B: 0.0896					
		EPA Set Co C: 0.01584					
		Emiss-Bench: D002					

**NVFEL Laboratory Test Data****CVS**

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2014-0038-005

Vehicle ID: FAPA-AAF

<u>Results</u>	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.003	0.172	0.026	1962.6	0.003	0.001	1.080

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.10			
Avg Cell Temp (degF)	75.15			
Dew Point (degF)	41.80			
Specific Humidity (grains/lbm)	40.22			
NOx Corr Factor	0.8595			
CO2 Dilution Factor	10.463			
CFV Vmix (scf @68F)	3063.71			

CVS Flow Rate Avg (scfm) 240.29

Fan Placement: One Fan - Up - Front

Phase Time (secs)	765.00
Distance (miles)	10.261
Bag Analysis Time (secs)	142.9

	<u>HWY</u>
IWR % diff	6.235
ASCR % diff	4.503
EER	-0.680

**MFR Test Results**

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
10028821	0.0025	0.06	0.002	185	0	0.0015	0.0012

<u>Odometer</u>	<u>MPG</u>
4374 M	47.7


MPG is 2.27 % higher than EPA MPG

MFR Lab: Audi AG Ingolstadt

Dyno: 8  
Fuel: 61 Tier 2 Cert Gasoline



Rep

NVFEL Laboratory Test Data							CVS	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2014-0038-006			Vehicle ID: FAPA-AAF					
	<b>Test Information</b>		Test Date: 1/29/2014		MFR Name: Volkswagen Group of			
			Key Start: 11:04:58		MFR Codes: 10015 VGA			
			Fuel Container ID: F00021		Config #: 01			
			Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: AUTO			
			Test Procedure: 89 us062bag (us06warmup_2bagus06)		Shift Schedule: A09980041			
			Calculation Method: Gasoline		Beginning Odometer: 004920.0 MI			
			Pretest Remarks: Wood blocks used to raise fan.		Drive Schedule: us06warmup_2bagus06			
<b>Bag Data</b>		<b>HC-FID</b>	<b>CO</b>	<b>NOx</b>	<b>CO2</b>	<b>CH4</b>	<b>NonMeth HC</b>	
		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
<b>Phase 1</b>								
Sample		5.201	6.512	2.014	1.158	2.350		
Ambient		4.482	0.705	0.027	0.048	2.057		
Net Concentration		1.107	5.868	1.989	1.114	0.471	0.598	
		Remarks: Wood block used to raise fan....						
<b>Phase 2</b>								
Sample		5.163	9.808	0.409	1.365	2.213		
Ambient		4.501	0.695	0.028	0.048	2.056		
Net Concentration		1.121	9.184	0.384	1.322	0.367	0.725	
		Remarks:						
<b>Phase 3</b>								
Sample								
Ambient								
Net Concentration								
		Remarks:						
<b>Phase 4</b>								
Sample								
Ambient								
Net Concentration								
		Remarks:						
<b>Results</b>		<b>HC-FID</b>	<b>CO</b>	<b>NOx</b>	<b>CO2</b>	<b>CH4</b>	<b>NMHC / NMOG</b>	<b>Vol MPG</b>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1		0.015	0.162	0.075	482.5	0.007	0.008 / 0.008	18.507
		0.007	0.110	0.006	248.4	0.003	0.004 / 0.004	35.950
Composite		0.00851	0.12126	0.02150	300.039	0.00360	(NMOG=1.04xNMHC) 0.0051 / 0.0054	
<b>Fuel Economy</b>		<b>Gasoline MPG</b>			<b>Dyno Settings</b>		<b>Dyno #:</b> D002	
Phase 1		18.48					Inertia: 3500	
Phase 2		35.90					EPA Set Co A: 12.77	
							EPA Set Co B: 0.0896	
							EPA Set Co C: 0.01584	
Composite		29.72					Emiss-Bench: D002	
v130711 - d002    EPAVDAEm140129103523    Page 1 of 2    Print Time 29-Jan-2014 16:33								



# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2014-0038-006

Vehicle ID: FAPA-AAF

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.027	0.286	0.133	854.7	0.013	0.014	1.080
	0.042	0.687	0.039	1553.5	0.016	0.027	

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.10	29.10		
Avg Cell Temp (degF)	74.73	75.43		
Dew Point (degF)	35.84	37.35		
Specific Humidity (grains/lbm)	31.80	33.76		
NOx Corr Factor	0.8312	0.8376		
CO2 Dilution Factor	11.561	9.808		
CFV Vmix (scf @68F)	1480.52	2268.39		

CVS Flow Rate Avg (scfm) 374.82 372.89

Fan Placement: US06 Only - One Large Fan - Down - Front

Phase Time (secs)	130.00	365.00	107.00
Distance (miles)	1.771	6.255	
Bag Analysis Time (secs)	148.1	400.2	

	US06-C	US06-H	US06-T
IWR % diff	0.892	-6.758	-2.830
ASCR % diff	-0.024	-5.171	-1.654
EER	0.182	-0.637	-0.412

### MFR Test Results

for Procedure 90 US06

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC	
10028820	0.0144	0.2	0.047	274	0	0.0102	0.0049

Odometer 4382 M  
MPG 32.2 PM 0.007  
MPG is 8.35 % higher than EPA MPG

MFR Lab: Audi AG Ingolstadt

Dyno: 8  
Fuel: 61 Tier 2 Cert Gasoline

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory[Gregory.Allen@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Thur 1/30/2014 12:33:21 PM  
**Subject:** VW Group Certification Requests submitted

Hi Jim,

Based on the division name changes that were completed yesterday, I have submitted two Certification Requests for new certificate processing.

Test groups:

FVGAV02.0APA

And

FVGAV02.0AUA

Thanks again for your help making this change happen.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Tue 1/28/2014 1:58:45 PM  
**Subject:** RE: Tire size on Audi FAPA-AAF

Correct no start/stop.

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Tuesday, January 28, 2014 8:57 AM  
**To:** Rodgers, William (EEO)  
**Subject:** RE: Tire size on Audi FAPA-AAF

This vehicle does not have Start/Stop, correct?

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Tuesday, January 28, 2014 7:20 AM  
**To:** Snyder, Jim; Giles, Michael (EEO)

**Subject:** RE: Tire size on Audi FAPA-AAF

Hi Jim,

The tire size on the car is correct and reflects the tire listed in the application. I have corrected the Supplemental Information where the error was found.

I have called and left a message with Ben Haynes also knowing he is in the office early.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Monday, January 27, 2014 5:37 PM  
**To:** Giles, Michael (EEO); Rodgers, William (EEO)  
**Subject:** FW: Tire size on Audi FAPA-AAF

Mike, Bill, does it have the correct tires and the data is wrong , or vice-versa?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Haynes, Ben  
**Sent:** Monday, January 27, 2014 4:22 PM  
**To:** Snyder, Jim  
**Cc:** Spieth, John  
**Subject:** Tire size on Audi FAPA-AAF

Verify shown drive tire as 215/55R17 but what was on the vehicle was 225/45R17.

**Ben Haynes**

Technical Information Specialist

TATD/VTC

Supporting the USEPA through Cooperative Agreement

under the SEE Program

Scheduling Office

734-214-4261

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Allen, Gregory[Gregory.Allen@vw.com]; Thomas, Richard (EEO)[Richard.Thomas@vw.com]  
**From:** Giles, Michael (EEO)  
**Sent:** Mon 1/27/2014 4:14:23 PM  
**Subject:** VW Group - Audi A8 / A8L Decision Information Submitted

Hello Jim,

I just submitted two decision information requests XML to VERIFY for the two vehicle configurations described below.

Test Group: FVGAV04.0NUA

Vehicle ID: FNUA-DAQ

Configuration 0: Audi A8 (FEDV)

Configuration 1: Audi A8L (FEDV)

Note 1: These are both FEDV's.

Note 2: Both configurations have start/ stop. Therefore, there is an extra FTP and US06 test for each configuration.

Note 3: These vehicles will be in a carryover test group (from MY14 FADXV04.03UJ).

Note 4: Both configurations had high FE for the FTP and Hwy tests and will require Mfr. confirmatory testing if waived.

Please advise of the decision at your earliest convenience.

Regards,

Michael Giles

Certification Engineer – EEO

VW Group of America

(248) 754-4229



**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Kata, Leonard (EEO)  
**Sent:** Tue 1/21/2014 2:15:29 PM  
**Subject:** VECI Label for 2015 TDI

Hello Jim:

I wanted to know whether you could give us a quick read on a proposed VECI for the VW 2015 2.0L TDI that we intend to certify to LEV III ULEV 125 in California. I believe that we may have spoken briefly about this already. VW has mocked up a VECI label (shown below). The issue is that EPA does not currently have a Tier 3 program in place and no corresponding Bin for ULEV 125. We propose to follow an approach that we saw on the General Motors VECI label for the 2014 Chevy Cruze Diesel which describes the applicable California emission standard as LEV160, but only describes the EPA standard as Tier 2, with no reference to a Bin.

WE need to get an early "okay" so that labels are available from our supplier in time for production.

Audi LOGO	AUDI AG		
	VEHICLE EMISSION CONTROL INFORMATION		
Conforms to regulations:			2015 MY
U.S. EPA:	Tier 2 LDV	OBD: CA II	Fuel: Diesel
California:	ULEV125 PC	OBD: CA II	Fuel: Diesel
No adjustments needed.	DFVTC/CAC/WR-HO2S/ OC/DPF+SCRC/SCRC/EGR/EGRC/NOXS		
Group: FVGAV02.0VAL	8V0 010 504 ??		
Evap: N/A			

Best regards,

Len

---

**Leonard W. Kata**

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

Audi LOGO	<b>AUDI AG</b> <b>VEHICLE EMISSION CONTROL INFORMATION</b>		
Conforms to regulations:			2015 MY
U.S. EPA:	Tier 2 LDV	OBD: CA II	Fuel: Diesel
California:	ULEV125 PC	OBD: CA II	Fuel: Diesel
No adjustments needed.	DF/ITC/CAC/WR-HO2S/ <b>OC/DPF+SCRC/SCRC/EGR/EGRC/NOXS</b>		
Group: FVGAV02.0VAL	8V0 010 504 ??		
Evap: N/A			

**From:** Kata, Leonard (EEO)  
**Location:** AA-Room-Office-N66-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** Accepted: FW: Fuel Cell certification and Testing  
**Start Date/Time:** Wed 1/22/2014 6:00:00 PM  
**End Date/Time:** Wed 1/22/2014 7:00:00 PM

**From:** Johnson, Stuart (EEO)  
**Location:** AA-Room-Office-N66-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** Accepted: VW: Fuel Cell certification and Testing  
**Start Date/Time:** Wed 1/22/2014 6:00:00 PM  
**End Date/Time:** Wed 1/22/2014 7:00:00 PM

;

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Johnson, Stuart (EEO)  
**Sent:** Fri 1/17/2014 12:44:12 PM  
**Subject:** RE: Fuel Cell testing

Hello Jim,

Thanks! Looking forward to seeing you next week.

Have a good weekend,

Stu

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Thursday, January 16, 2014 4:27 PM  
**To:** Johnson, Stuart (EEO)  
**Subject:** Fuel Cell testing

Stuart , I talked to Jenny today and scheduled a mtg. FYI, I'm told SAE J2572 is the recommended doc for testing procedure.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Mon 1/13/2014 4:21:02 PM  
**Subject:** Corrected Cert Request

Hi Jim,

I corrected the Application and resubmitted the Certification Request for the Audi TT/TTS test group FVGAV02.0AUA. Thanks

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Thomas, Richard (EEO)[Richard.Thomas@vw.com]; Allen, Gregory[Gregory.Allen@vw.com];  
Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Mon 1/13/2014 12:17:09 PM  
**Subject:** VW Group - Revised Certificate needed

Hello Jim,

I had to revised the Application and request a new certificate for test group FVGAV02.0AUA due to a corrected Manufacturer Division that should now indicate Audi. Please process this request as soon as possible so we can complete the fuel economy labelling on these models soon to be introduced.

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219



**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Allen, Gregory  
**Sent:** Fri 1/10/2014 4:59:46 PM  
**Subject:** Decision Information Uploaded to Verify

Hello Jim,

A confirmatory test decision was uploaded to Verify for the MY2015 Audi S8, Testgroup: FVGAV04.0NUA and Vehicle I.D: FNUA-S8Q.

Please let me know if you have any questions.

Best Regards / Mit freundlichen Grüßen,

Greg Allen

Emissions Certification Engineering Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

U.S.A.

Phone: (248) 754-4209

E-mail: [Gregory.Allen@vw.com](mailto:Gregory.Allen@vw.com)



**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Thur 1/9/2014 7:15:46 PM  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

Jim,

After checking them against the CSI's in the 2013/14 test group applications I'm not seeing any further coefficient discrepancies. It is common that we list worst case coefficients over multiple models of the same test group and engine/trans configuration such as Golf and Jetta, explaining the duplicates seen.

Thanks,

Bill

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Thursday, January 09, 2014 1:24 PM  
**To:** Rodgers, William (EEO)  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

Thanks Bill, I forwarded it on. Please also find out if those coefficients for the regular Jetta are correct in that table.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Thursday, January 09, 2014 1:03 PM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Allen, Gregory  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

Hi Jim,

Attached is the Jetta Hybrid ESP deactivation procedure requested.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Rodgers, William (EEO)

**Sent:** Thursday, January 09, 2014 12:38 PM

**To:** 'Snyder, Jim'

**Cc:** Giles, Michael; Allen, Gregory

**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

Hello Jim,

The Common application is clearly a typo. I will contact the factory and get it corrected for the upcoming Final submission (and 2014).

The Section 7 CSI in the test group application appears to show the correct values as also shown below:

Target Coef A (lbf)

Target Coef B (lbf/mph)

Target Coef C (lbf/mph<sup>2</sup>)

27.876

0.05426

0.01618

Our Certification test vehicle had the ESP permanently deactivated so we will have to inquire about the procedure for deactivating it in a production car and get back with you hopefully tomorrow.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]

**Sent:** Thursday, January 09, 2014 12:00 PM

**To:** Rodgers, William (EEO)

**Subject:** FW: equivalent test weight and target coefficients for a vw jetta hybrid

Hi Bill, Happy New Year. Someone from the other division is testing a Jetta hybrid and asked for target coefficients. I sent them the official numbers from the 2013 common file w/o looking at them. The ABCs for the Hybrid are really high, not the ones we used for testing. Now that I look at them, the Target ABCs for the hybrid (that we used) are 20% lower than the

regular hybrid. Can you find why the Hybrid's road load is lower than the standard version?  
Or is that table in the common section totally wrong?

Separate question, They are getting ABS and Traction lights. What is the procedure to get  
rolls mode? I don't recall this running 4 wheel dyno.

**From:** Doorlag, Mark  
**Sent:** Friday, December 20, 2013 1:17 PM  
**To:** Snyder, Jim  
**Cc:** Wright, DavidA  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

jim,

- the track coefficient units are listed using "lb ft." is this just a typo and should it be "lbf."

- it is also surprising to see such large a large target A coefficient, especially in comparison to  
the other jettas. this doesn't seem right.

- if i get the info from the 2013 data found at <http://www.epa.gov/otaq/tclldata.htm> it shows the  
same ETW but it gives the following track coefficients...

Target Coef A (lbf)	Target Coef B (lbf/mph)	Target Coef C (lbf/mph^2)
27.876	0.05426	0.01618

could vw be contacted to confirm that the values above are correct? or do you have another  
suggestion?

mark

**From:** Snyder, Jim  
**Sent:** Tuesday, December 17, 2013 6:52 PM  
**To:** Doorlag, Mark  
**Cc:** Wright, DavidA  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

From VW's FOI\_DVWXB\_COMMON file. The 1<sup>st</sup> line is for room temp conditions, the 2<sup>nd</sup> line is for 20F Cold testing.

Section 12VW Pg 4	Vehicle Test Parameters	Engine Code	R.CH-No.:	Revision Date
Common Section	All	All		02-24-2013

#### Exhaust Test Parameters

Model / Carline	Engine Displ./HP	Engine Code	Tires	TM / OD #	Axle	ETW	Road Track Coefficients			TCDT	Fuel tank Cap.	Fan Pos.	Shift Sched. I.D.	Test Fuel	[ ]
							F0	F1	F2						
	[liter/hp]					[lbs]	[lb ft]	[ lb ft / mph ]	[ lb ft / (mph) <sup>2</sup> ]	[sec]	40% 100% [ ]				
Golf 2 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0188	-	22.0 55.0	A	M5-1	Tier 2	5V
Golf 4 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0188	-	22.0 55.0	A	M5-1	Tier 2	5V
Jetta	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3500	30	0.20	0.0188	-	22.0 55.0	A	M5-1	Tier 2	5V
Golf 2 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3375	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V
Golf 4 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3500	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	37	0.32	0.0188	-	22.0 55.0	A	L6	Cold CO	5V
Jetta Hybrid	1.4 / 150	CNLA	195/65R15	L6 /2	1) 4.438 2) 3.227	3625	124	0.15	0.0278	23.61	45 <sup>18</sup>	A	L6	Tier 2	DV
Jetta Hybrid	1.4 / 150	CNLA	195/65 R15	L6 /2	1) 4.438 2) 3.227	3625	136	0.165	0.0306	-	45 <sup>18</sup>	A	L6	Cold CO	DV

#) OD = Overdrive, 1 =final gear ratio >1 ; 2 =final gear ratio < 1

\*) value = pre stage x axle

**From:** Doorlag, Mark

**Sent:** Monday, December 09, 2013 2:06 PM

**To:** Snyder, Jim

**Cc:** Wright, DavidA

**Subject:** equivalent test weight and target coefficients for a vw jetta hybrid

jim,

can you help me out with a ETW and target coefficients for a vw jetta hybrid? here is the more detailed info...



2013 vw jetta hybrid

vin

**Ex. 6**

test group

DVWXV01.4PHE

tires

continental 195/65R15 91H

thanks, mark

Section 12VW	Pg 4	Vehicle Test Parameters	Engine Code	R.CH-No.:	Revision Date
Common Section	All		All		02-24-2013

# Exhaust Test Parameters

Model / Carline	Engine Displ./HP	Engine Code	Tires	TM / OD #	Axle	ETW	Road Track Coefficients			TCDT	Fuel tank Cap.	Fan Pos.	Shift Sched. I.D.	Test Fuel	DF source
	[lited/np]					[lbs]	F0 [lb ft.]	F1 [lb ft./ mph]	F2 [lb ft./ (mph) <sup>2</sup> ]	[sec]	40% 100% []				

Golf 2 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3500	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 2 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3375	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3500	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	37	0.32	0.0188	-	22.0 55.0	A	L6	Cold CO	5V257

Jetta Hybrid	1.4 / 150	CNLA	195/65R15	L6 /2 1) 4.438 2) 3.227	3625	124	0.15	0.0278	23.61	18 45	A	L6	Tier 2	DVPHE
Jetta Hybrid	1.4 / 150	CNLA	195/65 R15	L6 /2 1) 4.438 2) 3.227	3625	136	0.165	0.0306	-	18 45	A	L6	Cold CO	DVPHE

#) OD = Overdrive, 1 =final gear ratio >1 ; 2 =final gear ratio < 1

) value = pre stage x axle

Section 12VW Pg 4 Vehicle Test Parameters			Engine Code		R.CH-No.:		Revision Date	
Common Section			All		All		02-24-2013	

### Exhaust Test Parameters

Model / Carline	Engine Displ./HP	Engine Code	Tires	TM / OD #	Axle	ETW	Road Track Coefficients			TCDT	Fuel tank Cap.	Fan Pos.	Shift Sched. I.D.	Test Fuel	DF source
							F0	F1	F2						
	[litedhp]					[lbs]	[lb ft]	[lb ft / mph]	[lb ft / (mph) <sup>2</sup> ]	[sec]	40% 100% []				

Golf 2 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3500	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 2 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3375	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3500	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	37	0.32	0.0188	-	22.0 55.0	A	L6	Cold CO	5V257

Jetta Hybrid	1.4 / 150	CNLA	195/65R15	L6 /2 1) 4.438 2) 3.227	3625	124	0.15	0.0278	23.61	18 45	A	L6	Tier 2	DVPHE
Jetta Hybrid	1.4 / 150	CNLA	195/65 R15	L6 /2 1) 4.438 2) 3.227	3625	136	0.165	0.0306	-	18 45	A	L6	Cold CO	DVPHE

#) OD = Overdrive, 1 =final gear ratio >1 ; 2 =final gear ratio < 1  
 \*) value = pre stage x axle

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory[Gregory.Allen@vw.com]  
**From:** Rodgers, William (EEO)  
**Sent:** Thur 1/9/2014 5:38:23 PM  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

Hello Jim,

The Common application is clearly a typo. I will contact the factory and get it corrected for the upcoming Final submission (and 2014).

The Section 7 CSI in the test group application appears to show the correct values as also shown below:

Target Coef A (lbf)	Target Coef B (lbf/mph)	Target Coef C (lbf/mph^2)
27.876	0.05426	0.01618

Our Certification test vehicle had the ESP permanently deactivated so we will have to inquire about the procedure for deactivating it in a production car and get back with you hopefully tomorrow.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Thursday, January 09, 2014 12:00 PM  
**To:** Rodgers, William (EEO)  
**Subject:** FW: equivalent test weight and target coefficients for a vw jetta hybrid

Hi Bill, Happy New Year. Someone from the other division is testing a Jetta hybrid and asked for target coefficients. I sent them the official numbers from the 2013 common file w/o looking at them. The ABCs for the Hybrid are really high, not the ones we used for testing. Now that I look at them, the Target ABCs for the hybrid (that we used) are 20% lower than the regular hybrid. Can you find why the Hybrid's road load is lower than the standard version? Or is that table in the common section totally wrong?

Separate question, They are getting ABS and Traction lights. What is the procedure to get rolls mode? I don't recall this running 4 wheel dyno.

**From:** Doorlag, Mark  
**Sent:** Friday, December 20, 2013 1:17 PM  
**To:** Snyder, Jim  
**Cc:** Wright, DavidA  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

jim,

- the track coefficient units are listed using "lb ft." is this just a typo and should it be "lbf."

- it is also surprising to see such large a large target A coefficient, especially in comparison to the other jettas. this doesn't seem right.

- if i get the info from the 2013 data found at <http://www.epa.gov/otaq/tcldata.htm> it shows the same ETW but it gives the following track coefficients...

Target Coef A (lbf)	Target Coef B (lbf/mph)	Target Coef C (lbf/mph^2)
27.876	0.05426	0.01618

could vw be contacted to confirm that the values above are correct? or do you have another suggestion?

mark

**From:** Snyder, Jim  
**Sent:** Tuesday, December 17, 2013 6:52 PM  
**To:** Doorlag, Mark  
**Cc:** Wright, DavidA  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

From VW's FOI\_DVWXB\_COMMON file. The 1<sup>st</sup> line is for room temp conditions, the 2<sup>nd</sup> line is for 20F Cold testing.

Section 12VW Pg 4	Vehicle Test Parameters	Engine Code	R.CH-No.:	Revision Date
Common Section	All	All		02-24-2013

#### Exhaust Test Parameters

Model / Carline	Engine Displ./HP	Engine Code	Tires	TM / OD #	Axle	ETW	Road Track Coefficients			TCDT	Fuel tank Cap.	Fan Pos.	Shift Sched. I.D.	Test Fuel	[ ]
							F0	F1	F2						
	[liter/hp]					[lbs]	[lb ft]	[ lb ft / mph ]	[ lb ft / (mph) <sup>2</sup> ]	[sec]	40% 100% [ ]				
Golf 2 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0188	-	22.0 55.0	A	M5-1	Tier 2	5V
Golf 4 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0188	-	22.0 55.0	A	M5-1	Tier 2	5V
Jetta	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3500	30	0.20	0.0188	-	22.0 55.0	A	M5-1	Tier 2	5V
Golf 2 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3375	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V
Golf 4 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3500	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	37	0.32	0.0188	-	22.0 55.0	A	L6	Cold CO	5V
Jetta Hybrid	1.4 / 150	CNLA	195/65R15	L6 /2	1) 4.438 2) 3.227	3625	124	0.15	0.0278	23.61	45 <sup>18</sup>	A	L6	Tier 2	DV
Jetta Hybrid	1.4 / 150	CNLA	195/65 R15	L6 /2	1) 4.438 2) 3.227	3625	136	0.165	0.0306	-	45 <sup>18</sup>	A	L6	Cold CO	DV

#) OD = Overdrive, 1 =final gear ratio >1 ; 2 =final gear ratio < 1

\*) value = pre stage x axle

**From:** Doorlag, Mark

**Sent:** Monday, December 09, 2013 2:06 PM

**To:** Snyder, Jim

**Cc:** Wright, DavidA

**Subject:** equivalent test weight and target coefficients for a vw jetta hybrid

jim,

can you help me out with a ETW and target coefficients for a vw jetta hybrid? here is the more detailed info...

2013 vw jetta hybrid

vin

**Ex. 6**

test group

DVWXV01.4PHE

tires

continental 195/65R15 91H

thanks, mark



Section 12VW	Pg 4	Vehicle Test Parameters	Engine Code	R.CH-No.:	Revision Date
Common Section	All		All		02-24-2013

### Exhaust Test Parameters

Model / Carline	Engine Displ./HP	Engine Code	Tires	TM / OD #	Axle	ETW	Road Track Coefficients			TCDT	Fuel tank Cap.	Fan Pos.	Shift Sched. I.D.	Test Fuel	DF source
	[lited/np]					[lbs]	F0 [lb ft.]	F1 [lb ft./ mph]	F2 [lb ft./ (mph) <sup>2</sup> ]	[sec]	40% 100% []				

Golf 2 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3500	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 2 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3375	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3500	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	37	0.32	0.0188	-	22.0 55.0	A	L6	Cold CO	5V257

Jetta Hybrid	1.4 / 150	CNLA	195/65R15	L6 /2 1) 4.438 2) 3.227	3625	124	0.15	0.0278	23.61	18 45	A	L6	Tier 2	DVPHE
Jetta Hybrid	1.4 / 150	CNLA	195/65 R15	L6 /2 1) 4.438 2) 3.227	3625	136	0.165	0.0306	-	18 45	A	L6	Cold CO	DVPHE

#) OD = Overdrive, 1 =final gear ratio >1 ; 2 =final gear ratio < 1

) value = pre stage x axle

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**From:** Rodgers, William (EEO)  
**Sent:** Fri 7/31/2015 10:53:44 AM  
**Subject:** RE: TDI generations  
[removed.txt](#)  
[TDI Generations.pdf](#)

Jim,

I've attached a pdf of the chart. It's a little fuzzy but readable.

Bill Rodgers

VWGoA EEO

(248) 754-4219

**From:** Rodgers, William (EEO)  
**Sent:** Thursday, July 30, 2015 10:29 AM  
**To:** "Jim Snyder" (Snyder.Jim@epamail.epa.gov)  
**Cc:** Giles, Michael; Allen, Gregory (EEO)  
**Subject:** TDI generations

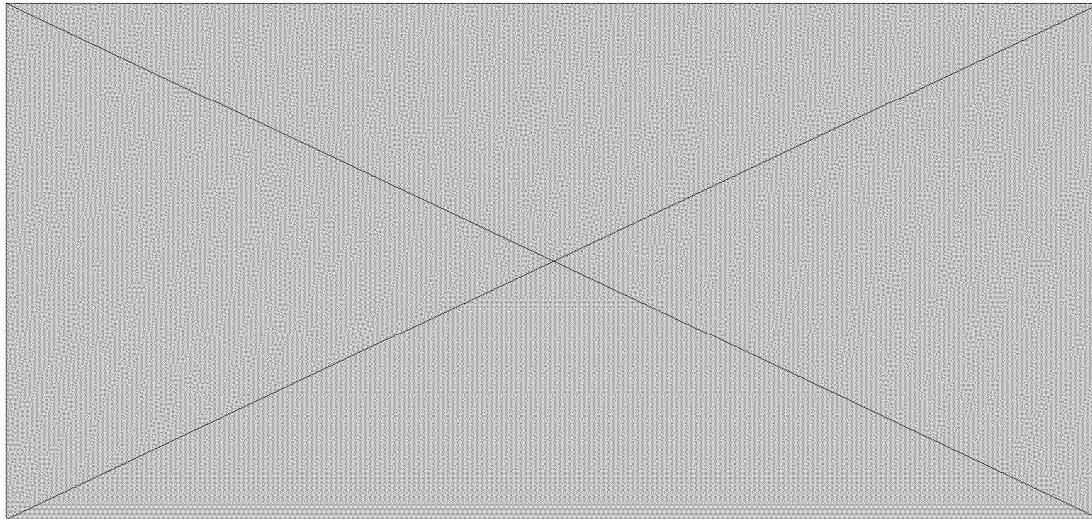
Jim,

Sorry for the delay in my response to your 2.0l TDI generations question?

This chart from my German colleague might help clarify what generation came when. Although the 14.5 model year identified in the chart was actually introduced in North America as 2015 model year.

The main technical differences between generations 1 and 2 was related to changes in after-treatment technology, NSC vs. SCR. The generation 3 engines also included a change to an

integral liquid-cooled intercooler/intake manifold assembly and a closer coupled DPF and Catalyst assembly as the major changes.



Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

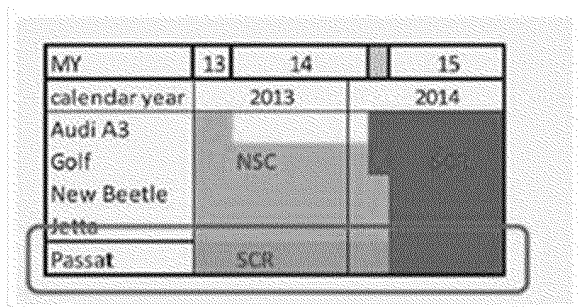
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**Project Timeline**

**VOLKSWAGEN**

2.0 TDI SCR Bio5/011272 Gen2 MY2015

Like the NSC concepts, also the SCR Passat will be updated to the Gen3 TDI engine with MY2015



- 2.0 TDI Gen1
- 2.0 TDI Gen2
- 2.0 TDI Gen3

**To:** Hennard, Mike (EEO)[mike.hennard@vw.com]; Schmidt, Oliver (EEO)[Oliver.Schmidt@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 11/3/2014 9:25:41 PM  
**Subject:** FW: Your EPA Inquiry - VW Recall Affects Fuel economy

Oliver , I appreciate your serious response to this inquiry. I don't know all the details since I haven't talk to him since my initial contact with him. Attached is the email thread. It contains his contact information but not the vehicle's VIN. He has been working with either a dealer or field rep. Some question regarding whether the field fix was correctly performed. I will notify him that someone may be contacting him to follow up on this.

John LaCroix is still here but he focuses on non-road now rather than Light Duty vehicles.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

▼ dfnail---10/22/2014 10:10:16 AM---Recipient [otag@epa.gov](mailto:otag@epa.gov)

From: [REDACTED]  
To: [OTAG@EPA](mailto:OTAG@EPA)  
Date: 10/22/2014 10:10 AM  
Subject: Your EPA Inquiry - (022101015) d [REDACTED] - Recall Affects Mileage [Fueleconomy] - OTAQ Web

---

Recipient  
[otag@epa.gov](mailto:otag@epa.gov)  
UserWord  
human  
Word  
human  
comments

During an arbitration hearing it was established by testing and driving data that my 2013 Jetta Hybrid dropped at least four mpg combined average after the recall was performed. That is a drop of about 9% in fuel efficiency. This could be due to either the innate characteristics of the transmission mod or the incorrect implementation of the mod. There is reason to believe that the mod was performed incorrectly, therefore VW corporate agreed to re-perform the mod.

Let me first note that the VW shop manual states that the transmission fluid level has to be exact or the function of the transmission will be impaired. When I was certain there was a sustained drop in milage, I took the car back to the dealer who had performed the recall. He said in writing that he rechecked the transmission fluid level and it was correct. However, the fluid level cannot be checked. It can only be drained completely and refilled with the exact amount. So, that is what needs to carefully be redone.

Also, the recall instructions specified that the transmission control software be updated. The dealer said that this was not done because it had already been done by the selling dealer before I took delivery. However, in checking with the selling dealer, it turned out that the earlier update was an overall software optimization and had nothing to do with the transmission recall software update. Therefore, this particular update needs to be done.

I know there cannot be 100% assurance that the re-performance of this recall will restore my fuel efficiency. However, it should be re-performed correctly so that it will not be a factor in determining the cause of lower fuel efficiency if it still exists after the redo. I am hopeful that the fuel efficiency I had before the recall can be restored.

However, if not, It would be helpful to know what VW's response is to the effect that the recall has on milage. Personally, I think a retest is in order.

Following is a long email thread with EPA trying to get to the bottom of this milage loss. Would you please update me on the results?

Thanks,  
Danny Nail

Mr. Snyder,

Was wondering if you got a response from VW yet. I see a lot of complaints on the message boards about low gas milage for the Jetta Hybrid. Consumer Reports test of the 2013 Jetta hybrid resulted in a 37 mpg combined average. My personal experience was that the recall transmission modification dropped my combined average gas milage by 4 mpg. Donâ€™t know if this was due to the characteristics of the mod itself or errors made in implementing the mod. It will be interesting to see how VW responds and if the car should be retested.

Thanks,  
Danny Nail

Begin forwarded message:

From: Danny Nail <[REDACTED]>  
Subject: Re: [FuelEconomy] Recall Affects Mileage  
Date: August 28, 2014 at 9:53:35 PM EDT  
To: "Snyder, Jim" <[Snyder.Jim@epa.gov](mailto:Snyder.Jim@epa.gov)>

Mr. Snyder,

Thank you very much for your reply. I look forward to hearing what response you get from VW and if you think their FE tests should be redone with possible changes in the advertised EPA mpg ratings.

Danny Nail

On Aug 28, 2014, at 4:41 PM, Snyder, Jim <[Snyder.Jim@epa.gov](mailto:Snyder.Jim@epa.gov)> wrote:

Mr. Nail,

I am in the Compliance Division and your email thread just made its way to me today. Historically the EPA was only interested in the possible emissions effects and not in any FE effects due to manufacturer recall campaigns or service bulletins. With the passing of the Greenhouse Gas Regulations such possible fuel economy changes could impact the manufacturer's declared CO2 output and their reported calculations could require revision. I do not think there is anything in the GHG regs with regard to the customer but some companies whose FE was found incorrect have voluntarily compensated customers on their own or through Class action agreements.

I was not aware of this particular VW recall until now so I am not familiar with the details of it. Just reading it I don't see mention of a calibration change. For starters, I will ask VW for a more detailed description of everything that is done for this campaign and what effect it has on fuel economy.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: Pugliese, Holly On Behalf Of ComplianceInfo  
Sent: Thursday, August 28, 2014 11:05 AM  
To: Snyder, Jim  
Subject: FW: [FuelEconomy] Recall Affects Mileage

Hi Jim. This long email trail just came to the compliance info box. This is the first time I'm seeing it there, but take a look and see if there is anything that can be said.

Thanks.

Holly Pugliese  
Office of Transportation and Air Quality  
US EPA

From: Danny Nail [REDACTED]  
Sent: Thursday, August 28, 2014 10:59 AM  
To: ComplianceInfo  
Subject: Fwd: [FuelEconomy] Recall Affects Mileage

Please respond to this question as stated in the email thread below.

If a manufacturer recalls a car to make safety changes, and the changes result in lower gas mileage, what is the manufacturer's responsibility to the customer who bought the car based on its gas mileage performance?

Danny Nail

Begin forwarded message:

From: Danny Nail <[REDACTED]>  
Subject: Re: [FuelEconomy] Recall Affects Mileage  
Date: August 14, 2014 at 4:42:29 PM EDT  
To: FuelEconomy <[fueleconomy@ornl.gov](mailto:fueleconomy@ornl.gov)>

Thanks. I will look forward to their response.

I know EPA was involved with Ford and their low milage, but that was due to testing errors and not a recall. Maybe if low milage exists for any reason, EPA would be interested in verifying that their ratings are not flawed, especially if there is evidence of lower than rated milage by independent testers or consumer real world experience in general.

Danny Nail

On Aug 14, 2014, at 4:30 PM, FuelEconomy <[fueleconomy@ornl.gov](mailto:fueleconomy@ornl.gov)> wrote:

Dear Mr. Nail,

Your email was re-sent to the EPA yesterday and this afternoon we received a response that it has been forwarded to one of their certification representatives with a request for him to respond to you. The EPA will have to clarify their position on this but it is likely a complicated issue without a simple answer. There was a case in the past involving Honda Civic Hybrids that were recalled and it was claimed by many consumers that the recall work lowered their fuel economy. There were quite a number of complaints and ultimately it was settled in court as a class action lawsuit between the affected consumers and Honda but the EPA did not get actively involved to our knowledge. The EPA is responsible for ensuring that Federal procedures are followed during certification and that no errors are made but assuming that the manufacture certified the vehicle correctly and in good faith, future unanticipated work performed on a model may be outside of EPA's scope unless there is sufficient data to force an investigation.

Hopefully the EPA will respond to your email this time. We at [www.fueleconomy.gov](http://www.fueleconomy.gov) get our data from the EPA but we are not in a position to speak on EPA's behalf about their policies regarding investigations and enforcement. If you do not hear back in the next week or so, we can only suggest contacting them directly at: <http://www.epa.gov/otaq/oms-cmt.htm> .

Sincerely,

[www.fueleconomy.gov](http://www.fueleconomy.gov)

-----Original Message-----

From: Danny Nail [mailto:[\[REDACTED\]](mailto:[REDACTED])]  
Sent: Wednesday, August 13, 2014 12:15 PM  
To: FuelEconomy  
Subject: Re: [FuelEconomy] Recall Affects Mileage



I haven't heard anything from EPA. Could you check the status on this and let me know if I will be hearing from them soon, or should I contact someone specifically?

Danny

On Aug 1, 2014, at 6:10 PM, FuelEconomy <[fueleconomy@ornl.gov](mailto:fueleconomy@ornl.gov)> wrote:

Danny,

Thank you for the additional information. This has been forwarded on to our contact at EPA. He will likely respond to you directly but if we hear back on this we will forward that response to you.

Sincerely,

[www.fueleconomy.gov](http://www.fueleconomy.gov)

-----Original Message-----

From: Danny Nail [REDACTED]  
Sent: Friday, August 01, 2014 12:54 PM  
To: FuelEconomy  
Subject: Re: [FuelEconomy] Recall Affects Milage

Thank you. Here are the details.

I bought a 2013 Jetta Hybrid that is mpg rated at 48 highway, 45 combined, and 42 city. I worked real hard at learning how to drive this car so I could consistently get 45 mpg average. Then, at 8630 miles I took it in for a factory safety recall that changed the transmission synthetic fluid to a mineral based fluid and reprogramed the transmission control software.

Since then I have not been able to ever achieve the 45 mpg average again even with the same or even more careful driving protocol. 41 to 42mpg average is the best I can do. I took it to the dealer at 14,961miles. They tested the car and recorded and documented a mpg of 36.2, even worse than mine. A VW corporate troubleshooter then tested the car on the interstate at a steady 70 mph for 55 miles and recorded and documented 46.1 mpg. He then declared there was nothing wrong with the car and that it was within the estimated mpg ratings.

I am dissatisfied with the VW response because I believe the car is now different than the car I bought and is underperforming the rated mpg.

My question is, what is the manufacturer's responsibility to the customer who bought this car based in large part on its advertised gas milage performance?

Sincerely,  
Danny Nail

[REDACTED]

On Aug 1, 2014, at 11:10 AM, FuelEconomy <[fueleconomy@ornl.gov](mailto:fueleconomy@ornl.gov)> wrote:

Hello Danny,

Thank you for contacting us. The Fuel Economy Website is produced at Oak Ridge National Laboratory with data supplied to us by the EPA. If you would like to provide us with details about your vehicle and the recall work done that may affect fuel economy, we would be happy to forward that to our contact at the EPA for a response. Alternatively, you could contact the EPA directly. The EPA's Office of Transportation and Air Quality is responsible for all vehicle testing, certification, and labeling. Their testing facility is located in Ann Arbor, Michigan and can be found on the web at: <http://www.epa.gov/nvfel/> Their main contact page is at: <http://www.epa.gov/otaq/oms-cmt.htm> . You could also send an email to [complianceinfo@epa.gov](mailto:complianceinfo@epa.gov) . Sorry we cannot provide you with a direct answer but this must be addressed by the EPA.

Sincerely,

[www.fueleconomy.gov](http://www.fueleconomy.gov)

-----Original Message-----

From: Danny Nail [REDACTED]  
Sent: Thursday, July 31, 2014 4:17 PM  
To: FuelEconomy  
Subject: [FuelEconomy] Recall Affects Milage

If a manufacturer recalls a car to make safety changes, and the changes result in lower gas milage, what is the manufacturer's responsibility to the customer who bought the car based on its gas milage performance?

Danny  
email  
[REDACTED]  
name  
Danny Nail  
org

referrer

ssubject  
Recall Affects Mileage [FuelEconomy]

-----  
WARNING NOTICE

This electronic mail originated from a federal government computer system of the United States Environmental Protection Agency (EPA). Unauthorized access or use of this EPA system may subject violators to criminal, civil and/or administrative action. For official purposes, law enforcement and other authorized personnel may monitor, record, read, copy and disclose all information which an EPA system processes. Any person's access or use, authorized and unauthorized, of this EPA system to send electronic mail constitutes consent to these terms.

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This information is for tracking purposes only.  
Submitting script: /cgi-bin/captcha.mail.cgi  
Submitting host: /cgi-bin/captcha.mail.cgi (97.101.202.55)

Browser: Mozilla/5.0 (Macintosh; Intel Mac OS X 10\_9\_5) AppleWebKit/600.1.17  
(KHTML, like Gecko) Version/7.1 Safari/537.85.10  
Referred: <http://www.epa.gov/otaq/oms-cmt.htm>  
TSSMS: orcdizux  
Mail to File: omsmail.txt  
-----

**To:** Snyder, Jim[Snyder.Jim@epa.gov]  
**Cc:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**From:** [REDACTED] Ex. 7  
**Sent:** Mon 11/3/2014 9:06:06 PM  
**Subject:** RE: VW owner/EPA Inquiry - HEV Recall Affects Fuel economy?

Hello Jim,

thanks for the notification, we take customer complaints like this very serious.

Please in the future send inquiries like this to [REDACTED] Ex. 7 [REDACTED] the Senior Compliance Manager in the EEO Team with a copy to myself.

J. Lacroy (??) from the In Use team has done this in the past. Did he leave you or does he have a new job within the EPA ?

Can you please give us more details (maybe a copy of the customer email) ?

We especially need the VIN and the location of the customer to investigate the car.

A Fuel economy decline of 4 mpg seems not possible with this Field Fix if performed properly.

If I remember correctly the Calibration flash only opens the clutches in case of a failure so the car can be moved.

We will take all steps necessary to investigate this issue.

[REDACTED] Ex. 7 [REDACTED]

[REDACTED] Ex. 7 [REDACTED]

**VOLKSWAGEN Group of America, Inc.**

3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4201  
Cell: (248) 760-6180  
FAX: (248) 754-4207  
E-Mail: [Oliver.Schmidt@vw.com](mailto:Oliver.Schmidt@vw.com)

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Friday, October 31, 2014 2:49 PM  
**To:** Ex. 7  
**Subject:** VW owner/EPA Inquiry - HEV Recall Affects Fuel economy?

Ex. 7 I'm not sure which of you is the right guy for this one. I have been corresponding with the owner of a 2013 Jetta Hybrid that had the DSG fluid recall done.

(Recall 13V568000: DSG Fluid Replacement), He seems pretty certain that he lost 4mpg since the campaign was performed. From what he says there is a drain and fill to a different trans fluid and corresponding calib. flashing done .

I believe I asked previously if there is indeed a calibration change associated with this campaign and if it potentially affects FE. I can't find the note so I don't know who I asked, not even positive that I sent it. In the mean time it sounds like his case went to arbitration and it came to light that the service may have incorrectly performed . Improper fluid level and no re-flash done.

Perhaps we can get some of this confusion straightened out. The email thread trails back to July. Name is Danny Nail if that helps. Firstly, can you find out exactly what changes this recall involves?

1. Is there a Cal change?
2. Does it typically affect FE?
3. Would improper fluid level affect FE?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]; Glas, Tobias[[Tobias.Glas@vw.com](mailto:Tobias.Glas@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Fri 10/31/2014 6:48:43 PM  
**Subject:** VW owner/EPA Inquiry - HEV Recall Affects Fuel economy?

Mike, Tobias, I'm not sure which of you is the right guy for this one. I have been corresponding with the owner of a 2013 Jetta Hybrid that had the DSG fluid recall done.

(Recall 13V568000: DSG Fluid Replacement), He seems pretty certain that he lost 4mpg since the campaign was performed. From what he says there is a drain and fill to a different trans fluid and corresponding calib. flashing done .

I believe I asked previously if there is indeed a calibration change associated with this campaign and if it potentially affects FE. I can't find the note so I don't know who I asked, not even positive that I sent it. In the mean time it sounds like his case went to arbitration and it came to light that the service may have incorrectly performed . Improper fluid level and no re-flash done.

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1. Is there a Cal change?
2. Does it typically affect FE?
3. Would improper fluid level affect FE?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[michael.giles@vw.com]; Mazaitis, Vincent[mazaitis.vincent@epa.gov]  
**Cc:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Rodgers, William (EEO)[William.Rodgers@vw.com]; Horton, Garrett (VWGoA Imp)[garrett.horton@volkswagen.de]  
**From:** Snyder, Jim  
**Sent:** Mon 9/28/2015 9:22:50 PM  
**Subject:** RE: VW Group: e-Tron prep / timing

They plan to precon it first thing so they'll probably start around 8:00.

**From:** Giles, Michael (EEO) [mailto:michael.giles@vw.com]  
**Sent:** Monday, September 28, 2015 4:13 PM  
**To:** Snyder, Jim; Mazaitis, Vincent  
**Cc:** Allen, Gregory (EEO); Rodgers, William (EEO); Horton, Garrett (VWGoA Imp)  
**Subject:** VW Group: e-Tron prep / timing

Hi Jim / Vince,

Just wondering if there is a set time for the e-tron prep tomorrow. If we do not hear from you we will send someone there at 7:00

My understanding is you are planning at least a fuel change, and overnight charge for the CD test on Wednesday. What I am not sure of is, will there also be a UDDS cycle on the dyno?

Thanks,

Mike

Michael Giles

Certification Engineer



Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4229

Fax: 248 754 4207

mailto: [Michael.Giles@VW.com](mailto:Michael.Giles@VW.com)

**To:** [Ex. 7]@vw.com]  
**Cc:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 9/24/2015 9:23:32 PM  
**Subject:** RE: vehicle question

[Ex. 7] to reiterate, my management thinks this car was already shipped and on its way here for confirmatory testing next week. We will tell the lab give it priority. So make sure someone is working on that.

I'm planning to take my Friday off but you can reach me on cell if urgent 248-943-4178. Dave Wright will be in Friday. Linc and Joel Ball will also be in but busy .

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Thur 9/24/2015 9:13:22 PM  
**Subject:** RE: vehicle question

No that's fine. I think the comment I saw was an artifact from the last confirmatory car. Don't worry about it.

**From:** Giles, Michael (EEO) [<mailto:michael.giles@vw.com>]  
**Sent:** Thursday, September 24, 2015 4:54 PM  
**To:** Snyder, Jim  
**Subject:** RE: vehicle question

Jim,

The comment I am looking at I interpret as AMS. Is this what you saw?

"MY 2016 VOLKSWAGEN Passat tested as Passat sedan with Automated Manual Selectable  
6 speed - ETW: 3875

**From:** Giles, Michael (EEO)  
**Sent:** Thursday, September 24, 2015 4:53 PM  
**To:** 'Snyder, Jim' <[Snyder.Jim@epa.gov](mailto:Snyder.Jim@epa.gov)>  
**Subject:** RE: vehicle question

AMS is correct! Do you want me to correct it?

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Thursday, September 24, 2015 4:45 PM  
**To:** Giles, Michael (EEO) <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
**Subject:** vehicle question

There's a stray comment in here that says "Diesel with manual transmission". This is an automated Manual (DCT) right?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Thur 9/24/2015 8:45:04 PM  
**Subject:** vehicle question

There's a stray comment in here that says "Diesel with manual transmission". This is an automated Manual (DCT) right?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 9/24/2015 6:38:36 PM  
**Subject:** RE: Audi e-tron tests

Yes, the lab uses the default 3% rotational inertia with the 4wd dyno

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Thursday, September 24, 2015 10:37 AM  
**To:** Snyder, Jim  
**Subject:** Audi e-tron tests

Hi Jim,

Considering the tests were run on a 4wd dyno, can you confirm if the standard 3% rotating mass was factored into the EPA dyno coefficients?

Regards,

Bill Rodgers

EEO

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 9/23/2015 9:12:12 PM  
**Subject:** Engine controller information for Touareg

Hi [Ex. 7]

Here is the information that I am requesting for a 2014 VW Touareg diesel. In order of priority:

- [Ex. 7] Listing of CAN addresses (PIDs) for the powertrain controller (ECU) to access engine /emissions parameters.
- [Ex. 7] Feature descriptions and engine parameter definitions/descriptions
- [Ex. 7] Appropriate ETAS A2O file for monitoring aftertreatment such as exhaust and emissions sensor, dosing, models... if available
- [Ex. 7] Software listing file

Preferably all in English but I don't want to wait if not available. I would really like to get the first two items early next week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 9/23/2015 5:56:41 PM  
**Subject:** RE: BEV 5-cycle testing

The only one who has officially done 5 cycle CD is Tesla. A major factor is that most Mfrs have found the results are little or no better than the 0.7 adjustment factor. The SAE subcommittee has been working on this for some time. There is a draft and it is close to a vote.

I think there is a VW rep who has been present at some of the mtg -which also include Dyno loading and coastdown testing procedures. Look for SAE j1634 draft proposal or ask your SAE rep for it. It outlines procedures for measuring the 5 cycles. It also includes the latest version of the multicycle procedure.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Wednesday, September 23, 2015 1:15 PM  
**To:** Snyder, Jim  
**Cc:** Horton, Garrett (VWGoA Imp); Giles, Michael (EEO); Allen, Gregory (EEO)  
**Subject:** BEV 5-cycle testing

Jim,

For BEV 5-cycle testing do you have information or a reference for how to measure cycle energy for all 5 test cycles individually? When we do full charge depletion tests we base the cycle energy off of the recharge energy after the end of the test, and then divide it over the number of cycles. For 5 cycle testing where we begin a test with ~50% SOC how are other manufacturers measuring their energy over the cycle?

If you have questions or need clarification we can discuss it further next week when we are over for the e-tron CD tests.



Regards,

Bill Rodgers

Emissions Certification Engineer

Volkswagen Group

3800 Hamlin Rd

Auburn Hills, MI 48326

p. (248) 754-4219

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 8/5/2015 6:49:46 PM  
**Subject:** PHEV calculation spreadsheet  
PHEV Calculator v18 with sample data.xlsm

[Ex. 7] please pass this on to [Ex. 7] whoever is doing the numbers.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** French, Roberts  
**Sent:** Wednesday, August 05, 2015 2:01 PM  
**To:** Snyder, Jim  
**Subject:** RE: Questions regarding CD-15-15

There will be a new version in the next month or two that has a few more things automated and will add some new CAFÉ calculations that came about as a result of new legislation from last December (for MY16 CAFÉ).

Please let users know they should contact me with any questions.

Thanks,

Rob

**Roberts W. French, Jr.**

U.S. Environmental Protection Agency

National Vehicle and Fuel Emissions Laboratory

2000 Traverwood Drive

Ann Arbor, Michigan 48105

(734) 214-4380

**To:** Glas, Tobias[Tobias.Glas@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 7/30/2015 9:43:01 PM  
**Subject:** Cold CO testing

From 1066.710. It specifically says that control for A/C should be turned off and control set to defrost. Now the A/C *compressor* will likely cycle on during defrost mode in most cars but that's a function of the vehicle design.

(c) *Heater and defroster.* During the test, operate the vehicle's interior climate control system with the heat on and set to primarily defrost the front window. Turn air conditioning off. You may not use any supplemental auxiliary heat during this testing. You may set the heater to any temperature and fan setting during vehicle preconditioning.

(1) *Manual control.* Unless you rely on automatic control as specified in paragraph (c)(2) of this section, take the following steps to control heater settings:

(i) Set the climate control system as follows before the first acceleration ( $t=20$  s), or before starting the vehicle if the climate control system allows it:

(A) *Temperature.* Set controls to maximum heat. For automatic control systems running in manual mode, set the heater control to 72 °F or higher.

(B) *Fan speed.* Set the fan speed to full off or the lowest available speed if a full off position is not available.

(C) *Airflow direction.* Direct airflow to the front window (window defrost mode).

(D) *Air source.* If independently controllable, set the system to draw in outside air.

(ii) At the second idle of the test cycle, which occurs 125 seconds after the start of the test, set the fan speed to maximum. Complete by 130 seconds after the start of the test. Leave temperature and air source settings unchanged.

(iii) At the sixth idle of the test interval, which occurs at the deceleration to zero miles per hour 505 seconds after the start of the test, set the fan speed to the lowest setting that maintains air flow. Complete these changes by 510 seconds after the start of the test. You may use different vent and fan speed settings for the remainder of the test. Leave the temperature and air source settings unchanged.

(2) *Automatic control.* For vehicles with automatic control systems running in automatic mode, set the temperature to 72 °F and the air flow control to the front window defrost mode for the

whole test.

(3) *Multiple-zone systems*. For vehicles that have separate driver and passenger controls or separate front and rear controls, you must set all temperature and fan controls as described in paragraphs (c)(1) and (2) of this section, except that rear controls need not be set to defrost the front window.

Jim Snyder  
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Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Snyder, Jim  
**Location:** Telephone Conference  
**Importance:** Normal  
**Subject:** Accepted: Jetta 1.4L SIL (GSI)  
**Start Date/Time:** Wed 7/29/2015 1:00:00 PM  
**End Date/Time:** Wed 7/29/2015 1:30:00 PM

**To:** Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 7/23/2015 5:04:22 PM  
**Subject:** FW: Diesel nicknames

**From:** Snyder, Jim  
**Sent:** Wednesday, July 22, 2015 3:32 PM  
**To:** 'Rodgers, William (EEO)'  
**Subject:** Diesel nicknames

Hi Bill, can you clarify the 4 cylinder Diesel engine naming? I'm hearing new and next gen, and gen 3 kicked around, , it may be confusing

Prior to 2013 MY there was the TDi with NOX adsorber (Gen 1?)

For 2013 MY a new version with SCR was available in the Passat only. (Gen 2?, new Gen?)

For 2014MY the SCR version expanded to Golf, Jetta, and Beetle.

For 2015MY a newer, more compact TDI w/SCR offered on Passat, Golf, Jetta, and Beetle. (do you call this Gen 3? Handouts call it "next generation")

For 2016MY, I'm testing a carryover version in a Golf right now.

I know you call the latest gasoline TFSI engine the "Gen III" but Carb is calling the latest diesel that too.

And this doesn't cover the Audi V6s...

Jim Snyder

Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)



**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 7/22/2015 7:32:30 PM  
**Subject:** Diesel nicknames

Hi Bill, can you clarify the 4 cylinder Diesel engine naming? I'm hearing new and next gen, and gen 3 kicked around, , it may be confusing

Prior to 2013 MY there was the TDi with NOX adsorber (Gen 1?)

For 2013 MY a new version with SCR was available in the Passat only. (Gen 2?, new Gen?)

For 2014MY the SCR version expanded to Golf, Jetta, and Beetle.

For 2015MY a newer, more compact TDI w/SCR offered on Passat, Golf, Jetta, and Beetle. (do you call this Gen 3? Handouts call it "next generation")

For 2016MY, I'm testing a carryover version in a Golf right now.

I know you call the latest gasoline TFSI engine the "Gen III" but Carb is calling the latest diesel that too.

And this doesn't cover the Audi V6s...

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 7/20/2015 1:42:41 PM  
**Subject:** RE: VW370 40145/16

[Ex. 7] I see it in Verify scheduled for retest on the 21<sup>st</sup>.

Jim

**From:** [Ex. 7]@vw.com]  
**Sent:** Friday, July 17, 2015 9:30 AM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** RE: VW370 40145/16

Hello Jim,

We are requesting a retest for the Highway cycle for Vehicle ID: VW370 40145/16, a 2016 Golf TDI configured as a Jetta Sedan. This decision is based on the official EPA rounded adjusted fuel economy of 64.4 MPG Highway found in Verify which is 3.2% below the Volkswagen test result of 66.5 MPG.

We are asking that this test be reschedule as soon as possible because of a short lead time to product launch. Please let us know the test date as soon as possible.

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**

**From:** Mazaitis, Vincent [<mailto:mazaitis.vincent@epa.gov>]

**Sent:** Thursday, July 16, 2015 11:56 AM

**To:** Ex. 7

**Cc:** Snyder, Jim; Gordinier, Terry

**Subject:** VW370 40145/16

Please find enclosed, the Subject information. If you have any questions or concerns, please contact me.

Thank you,

Vince Mazaitis

(734)214-4864

**To:** [Ex. 6]  
**Cc:** Jackson, Judy[Jackson.Judy@epa.gov]; Pugliese, Holly[pugliese.holly@epa.gov]; Somoza, Sandra[Somoza.Sandra@epa.gov]; Verify[Verify@epa.gov]; [Ex. 7]  
[Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 7/14/2015 1:02:51 PM  
**Subject:** RE: Request from VOLKSWAGEN Group of America: RE: Certificate for TG: GVGAV02.0VBD  
Evap: GVGAR0110VAE Is Waiting To Be Signed

It looks like this is still an issue. Yesterday I denied a certificate request for GVGAV01.4VUP to unlock it and then VW resubmitted it. When I opened it and started reviewing it, Greg Allen at VW started getting additional rejection notices. It appeared that every time I refreshed the page he received another notification (?)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [Ex. 6]  
**Sent:** Tuesday, July 07, 2015 4:00 PM  
**To:** Snyder, Jim  
**Cc:** Jackson, Judy; Pugliese, Holly; Somoza, Sandra; Verify; [Ex. 7]  
**Subject:** RE: Request from VOLKSWAGEN Group of America: RE: Certificate for TG: GVGAV02.0VBD Evap: GVGAR0110VAE Is Waiting To Be Signed

It looks like the last notification was sent at 1:57 PM today. Now that the certificate has been issued these notifications may have stopped. I will check periodically to see if it happens again and warrants investigation.

[Ex. 6]

[Ex. 6]

Help Desk Analyst

[Ex. 6]

## Ex. 6

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery.

NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

From: "Snyder, Jim" <[Snyder.Jim@epa.gov](mailto:Snyder.Jim@epa.gov)>

To: Ex. 7 Verify <[Verify@epa.gov](mailto:Verify@epa.gov)>

Cc: "Somoza, Sandra" <[Somoza.Sandra@epa.gov](mailto:Somoza.Sandra@epa.gov)>, "Jackson, Judy" <[Jackson.Judy@epa.gov](mailto:Jackson.Judy@epa.gov)>, "Pugliese, Holly" <[pugliese.holly@epa.gov](mailto:pugliese.holly@epa.gov)>,  
Ex. 6

Date: 07/07/2015 03:34 PM

Subject: RE: Request from VOLKSWAGEN Group of America: RE: Certificate for TG: GVGAV02.0VBD Evap: GVGAR0110VAE Is Waiting To Be Signed

---

I think it was a result of resubmitting into the signing queue. I had trouble getting them to "send back". Unless it happens again I don't think it warrants the help desk's time.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

-----Original Message-----

From: Rodgers, William (EEO)

Ex. 7

Sent: Tuesday, July 07, 2015 3:24 PM

To: Snyder, Jim; Verify

Cc: Somoza, Sandra; Jackson, Judy; Pugliese, Holly;

Ex. 6

Subject: RE: Request from VOLKSWAGEN Group of America: RE: Certificate for TG: GVGAV02.0VBD Evap: GVGAR0110VAE Is Waiting To Be Signed

It was 6 copies of each message to each recipient in the office. Using ASTM rounding that's more than 6. ;) -Bill

-----Original Message-----

From: Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]

Sent: Tuesday, July 07, 2015 3:14 PM

To: Verify;

Ex. 7

Cc: Somoza, Sandra; Jackson, Judy; Pugliese, Holly;

Ex. 6

Subject: RE: Request from VOLKSWAGEN Group of America: RE: Certificate for TG: GVGAV02.0VBD Evap: GVGAR0110VAE Is Waiting To Be Signed

**Ex. 7** was it less than 6 messages? If so I'd say lets ignore it. There were 2 certificates for same test group that I had to resubmit because they had the wrong signature on them.  
-Jim

-----Original Message-----

From: Ellinger, Sandy On Behalf Of Verify  
Sent: Tuesday, July 07, 2015 2:27 PM  
To: **Ex. 7**; Snyder, Jim  
Cc: Verify; Somoza, Sandra; Jackson, Judy; Pugliese, Holly  
Subject: Request from VOLKSWAGEN Group of America: RE: Certificate for TG: GVGAV02.OVBD Evap: GVGAR0110VAE Is Waiting To Be Signed

July 7, 2015

**Ex. 7**

The email you have forwarded appears to be an automatic email sent to you by the VERIFY system. I have copied Jim Snyder of the Light Duty Vehicle Center in Ann Arbor. I believe Jim is your certification rep. Perhaps Jim can help resolve this issue.

Thank you.

Sandy Ellinger  
Senior Environmental Employment (SEE) Program US Environmental Protection Agency Office of Transportation and Air Quality Compliance Division \* Data Analysis and Information Center  
Tel: 734.214.4764 \* Fax: 734.214.4053 \* Office: N -102 [ellinger.sandy@epa.gov](mailto:ellinger.sandy@epa.gov)  
\* <http://epa.gov/otag/verify/>

-----Original Message-----

From: **Ex. 7** [mailto:**Ex. 7**@vw.com]  
Sent: Tuesday, July 07, 2015 12:23 PM  
To: Verify  
Subject: FW: Certificate for TG: GVGAV02.OVBD Evap: GVGAR0110VAE Is Waiting To Be Signed

We are getting repeats of the attached message over and over. Please cancel them.

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
Auburn Hills, MI

**Ex. 7**

-----Original Message-----

From: [no-reply@epa.gov](mailto:no-reply@epa.gov) [mailto:[no-reply@epa.gov](mailto:no-reply@epa.gov)]  
Sent: Tuesday, July 07, 2015 12:21 PM  
To: **Ex. 7**

Ex. 7

Subject: Certificate for TG: GVGAV02.0VBD Evap: GVGAR0110VAE Is Waiting To Be Signed

The following is a courtesy copy of status message for a Verify submission.  
Any references made to links refer to links which will appear in the CDX Inbox message.

The certificate request for Test Group GVGAV02.0VBD and Evaporative Family GVGAR0110VAE has been approved and is now waiting to be signed. A copy of the signed certificate will be sent as soon as it is available.

The Verify submission this message relates to has the following values:

Test Group Name: GVGAV02.0VBD

The following transaction identifier has been assigned to this request:

\_0b883d2b-9416-461d-b3ba-2bce362882de

Please do not reply to this message.

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 7/13/2015 8:39:57 PM  
**Subject:** RE: Jetta 1.4L Shift Light Survey

[Ex. 7] thanks for the handout. Let me look at this some more. Since there are others now asking for alternatives I have to look at what we can do while still keeping a level playing field.

**From:** [Ex. 7]@vw.com]  
**Sent:** Monday, July 13, 2015 1:25 PM  
**To:** Snyder, Jim  
**Subject:** Jetta 1.4L Shift Light Survey

Hello Jim:

I presented your suggestion regarding establishing shift speeds for the 2016 Jetta 1.4L based on good engineering judgment, supported by a follow-up survey of customers. The factory had considered this option but decided not to follow this approach.

Instead, I have attached a follow-up presentation which addresses your earlier suggestion to examine the survey data for driving experience relevant to the FTP and US06 test cycles. We would like to discuss this approach with you at your earliest convenience. Would you have a time that we could hold another telephone conference, preferably one morning early this week?

Best regards,

[Ex. 7]

---

**Ex. 7**



**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: **Ex. 7**

Cell: **Ex. 7**

Fax: **Ex. 7**

E-Mail: **Ex. 7**

**To:** Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 7/13/2015 3:38:55 PM  
**Subject:** RE: GVGAV01.4VUP correction

Okay, it should be unlocked now.

**From:** Giles, Michael (EEO) [mailto:michael.giles@vw.com]  
**Sent:** Monday, July 13, 2015 11:27 AM  
**To:** Snyder, Jim  
**Cc:** Rodgers, William (EEO); Allen, Gregory (EEO)  
**Subject:** GVGAV01.4VUP correction

Hello Jim,

As we just discussed, the corrected test group data was rejected.

Please reject the existing cert request for this test group and we will try to submit the correction for the engine displacement.

Thanks,

Mike

Michael Giles

Certification Engineer

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4229

Fax: 248 754 4207

mailto: [Michael.Giles@VW.com](mailto:Michael.Giles@VW.com)

**To:** Stump, Barbara[Stump.Barbara@epa.gov]  
**Cc:** Thomas, Richard (EEO)[Richard.Thomas@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 7/1/2015 3:58:33 PM  
**Subject:** RE: 2016 Volkswagen Certification Fee Filing Forms

Oh, okay. Thanks Barbara.

**From:** Stump, Barbara  
**Sent:** Wednesday, July 01, 2015 9:33 AM  
**To:** Snyder, Jim  
**Cc:** Thomas, Richard (EEO)  
**Subject:** RE: 2016 Volkswagen Certification Fee Filing Forms

Hi Jim,

The payment has been received and the three test groups GVGAV03.6VUF, GVGAV03.6VUG and GVGAT03.6VUK are listed as paid in our fees system

Barbara Stump

MVECP Fees

734-214-4256

**From:** Snyder, Jim  
**Sent:** Wednesday, July 01, 2015 8:55 AM  
**To:** Thomas, Richard (EEO); Fees  
**Cc:** Stump, Barbara  
**Subject:** RE: 2016 Volkswagen Certification Fee Filing Forms

Actually The forms are in the Certificate application but I don't go by just the form. I look in Verify and our internal database to see if it's on the paid list. Sounds like its too soon and I just need to wait a few more days. .

**From:** Thomas, Richard (EEO) [<mailto:Richard.Thomas@vw.com>]  
**Sent:** Wednesday, July 01, 2015 6:10 AM  
**To:** Fees  
**Cc:** Stump, Barbara  
**Subject:** 2016 Volkswagen Certification Fee Filing Forms

Please find the EPA fee filing for three Volkswagen 2016 test groups; GVGAV03.6VUF, GVGAV03.6VUG and GVGAT03.6VUK. Certification fees in the total amount of \$80,223 were electronically paid on June 26, 2015 and would have been available in the EPA account by last Monday, June 29<sup>th</sup>.

If you have any questions please contact me directly.

Regards,

Richard

Richard E. Thomas

Senior Emission Certification Specialist

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4213

Fax: 248 754 4207

mailto: [Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** Thomas, Richard (EEO)[Richard.Thomas@vw.com]; Fees[Fees@epa.gov]  
**Cc:** Stump, Barbara[Stump.Barbara@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Wed 7/1/2015 12:55:20 PM  
**Subject:** RE: 2016 Volkswagen Certification Fee Filing Forms

Actually The forms are in the Certificate application but I don't go by just the form. I look in Verify and our internal database to see if it's on the paid list. Sounds like its too soon and I just need to wait a few more days. .

**From:** Thomas, Richard (EEO) [mailto:Richard.Thomas@vw.com]  
**Sent:** Wednesday, July 01, 2015 6:10 AM  
**To:** Fees  
**Cc:** Stump, Barbara  
**Subject:** 2016 Volkswagen Certification Fee Filing Forms

Please find the EPA fee filing for three Volkswagen 2016 test groups; GVGAV03.6VUF, GVGAV03.6VUG and GVGAT03.6VUK. Certification fees in the total amount of \$80,223 were electronically paid on June 26, 2015 and would have been available in the EPA account by last Monday, June 29<sup>th</sup>.

If you have any questions please contact me directly.

Regards,

Richard

Richard E. Thomas

Senior Emission Certification Specialist

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4213

Fax: 248 754 4207

mailto: [Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)



**To:** Thomas, Richard (EEO)[Richard.Thomas@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 6/30/2015 9:35:04 PM  
**Subject:** cert fees

Richard, I was reviewing certificates and noticed that the cert fees for GVGAV03.6VUG and GVGAV03.6VUF are not listed as paid. Too soon or a SNAFU?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 6/17/2015 8:57:48 PM  
**Subject:** US06 Test Number GVGA91002750

Process Code	New Submission	Mfr Code	VGA - Volkswagen Group of America, Inc.
Test Number	GVGA91002750	Exhaust Evap Test Number	
Vehicle ID / Configuration	<u>VW361-6-0106 / 0</u>	Link	
		Test Date	2015-06-16

#### EPA Only Fields

Dataset Status	Active	Submission Date	06/17/2015
Test Category	US06	LOD Test Number	20150224005
EPA Dyno Number	D329	Test 5-Cycle Category	US06

#### Test Particulars

Test Procedure	90 - US06	Test Fuel Type	61 - Tier 2 Cert Gasoline
Verify Test Lab ID		Odometer Units	M
Test Start Odometer Reading	4495	4WD Test Dyno	No
State of Charge Delta Indicator		E10 Evaporative Test Measurement Method	
Drive Cycle Speed Tolerance Criteria	Used Part 1066 (+/- 2.0 mph, +/- 1.0 sec)	Road Speed Fan Usage Indicator	No
Fuel Batch Mfr Code	LOD	Fuel Batch ID	<u>F0027N</u>
Fuel Batch Calibration Number	341	Diesel Adjustment Factor Usage	Downward
Retest Indicator	No	Retest Reason	N/A
Verify Test Number That Was Retested		Manufacturer	--
Original Manufacturer Verify-Test Number That Was Confirmed		Confirmatory Test?	

#### Analytically-Derived FE / CREE

Analytically Derived?	No	ADFE Base Verify Test Number
-----------------------	----	------------------------------

ADFE Total Road Load Horsepower	N/A	ADFE ETW	N/A
ADFE N/V Ratio	N/A		

# Test Results

Fuel Economy Value Units    miles per gallon

<u>Test Result Name</u>	<u>Unrounded Verify-Calculated Fuel Economy</u>	
	<u>Test</u>	<u>Mile Per Gallon Equivalent Value</u>
PM ( Particulate Matter )	0.0004533	--
OPT-CREE ( Optional Carbon-Related Exhaust Emissions )	0	--
NOX ( Nitrogen Oxide )	0.0159038	--
NMOG ( Non-methane organic gas (California) )	0.0039502	--
N2O ( Nitrous Oxide )	0.0007094	--
MFR FE ( Manufacturer Fuel Economy )	33.1548414	--
METHANE ( CH4 - Methane )	0.0048742	--
HC-TOTAL ( Total Hydrocarbon )	0.008328	--
HC-NM+NOX ( SFTP Non-methane Hydrocarbon + Nitrogen Oxides for US06 or SC03 )	0.0197021	--
HC-NM ( Non-methane Hydrocarbon )	0.0037983	--
FE BAG 2 ( Bag 2 Fuel Economy )	40.3487459	--
FE BAG 1 ( Bag 1 Fuel Economy )	20.4513574	--
DT-IWRR ( Drive Trace Inertia Work Ratio Rating )	-	--
	6.731931	
DT-EER ( Drive Trace Energy Economy Rating )	-1.65338	--
DT-ASCR ( Drive Trace Absolute Speed Change Rating )	-	--
	5.246308	
CREE ( Carbon-Related Exhaust Emissions )	0	--
CO2 BAG 2 ( Bag 2 Carbon Dioxide )	220.4980425	--
CO2 BAG 1 ( Bag 1 Carbon Dioxide )	428.9404293	--
CO2 ( Carbon dioxide )	266.5698477	--
CO ( Carbon Monoxide )	1.5062005	--

# Test Standards / Certification Levels

Cert Region	Federal	Cert/In-Use Code	Cert
Vehicle Class	LDV/Passenger Car	Standard Level	Federal Tier 2 Bin 5
Fuel	Gasoline	Test Procedure	US06



**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 6/16/2015 1:09:05 PM  
**Subject:** VW Group to be revamped into 4 holding companies, reports say

I suppose its too early to tell but any idea if this will affect are dealings? Do you think certification will stay responsible for all brands?

<http://www.autonews.com/article/20150615/COPY01/306159919/vw-group-to-be-revamped-into-4-holding-companies-reports-say>

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 6/15/2015 2:11:40 PM  
**Subject:** Jetta retest

I talked to Ben and they plan to retest the Jetta some time Tuesday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Fri 6/12/2015 5:08:36 PM  
**Subject:** RE: VW361-6-0106 DF correction

I guess we can sort it out later then. I'm not too concerned about a typo.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Friday, June 12, 2015 11:43 AM  
**To:** Snyder, Jim  
**Subject:** VW361-6-0106 DF correction

Hi Jim,

I attempted to correct the NOx DF in the Supplemental Information so the tests won't be flagged as failures but was unsuccessful. I believe Verify rejected the correction because the new retest request has over-ridden the earlier FTP and Hwy test requests.

**To:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**Cc:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]; Haynes, Ben[haynes.ben@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Fri 6/12/2015 4:45:19 PM  
**Subject:** RE: VW361-6-0106

Okay Bill, I've requested a retest of the US06.

**From:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**Sent:** Friday, June 12, 2015 10:33 AM  
**To:** Snyder, Jim  
**Cc:** [REDACTED] Ex. 7 [REDACTED]  
**Subject:** RE: VW361-6-0106

Hell Jim,

We would like to retest the US06 as the result of exceeding the 3% criteria.

Please schedule the test as soon as possible and let us know the new test date.

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**





**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Thur 6/4/2015 9:22:08 PM  
**Subject:** RE: cert load

Good news, I got approval at the last minute to work longer so I've reviewed and approved #1 and #2 on Bill's priority list.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Giles, Michael (EEO) [<mailto:michael.giles@vw.com>]  
**Sent:** Thursday, June 04, 2015 3:59 PM  
**To:** Snyder, Jim  
**Subject:** RE: cert load

Thanks for the feedback Jim, we can touch base next week. Have a good weekend!

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Thursday, June 04, 2015 3:30 PM  
**To:** Giles, Michael (EEO)  
**Subject:** cert load

Hi Mike , I just heard you Voice mail. Its been quite the week. Not good timing for your cert requests. First they took my laptop for 2 days, got the new one late yesterday, and then offsite testing today. Just got back a few minutes ago but I have to leave by 3:30 because I started way early and not authorized, or paid for overtime.

Friday is also my day off. The good news is nothing scheduled for Monday so I hope to focus on Certs. I see 10 VW and 3 porsche in the queue. Is that what you see?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**Cc:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Mon 5/18/2015 3:10:22 PM  
**Subject:** RE: VW Groups Vehicle GAPA-TAQ Retest

Bill, I submitted a retest this morning but I'll have to talk to the lab about your driver request. Historically they have not assigned tests to specific drivers.

**From:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**Sent:** Monday, May 18, 2015 7:09 AM  
**To:** Snyder, Jim  
**Cc:** [REDACTED] Ex. 7 [REDACTED]  
[REDACTED] Ex. 7 [REDACTED]  
**Subject:** VW Groups Vehicle GAPA-TAQ Retest

Hello Jim,

We have decided to request a retest of the Audi TT VID: GAPA-TAQ on the FTP cycle using a different driver. Our request is based on initial result being 4.7% lower than the factory test which falls well outside the 3% allowable retest threshold. Please let me know the soonest available test date or if you have any concerns about our request.

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**

**Ex. 7**

**From:** Ex. 7  
**Sent:** Thursday, May 14, 2015 8:42 AM  
**To:** 'Mazaitis, Vincent'; Glas, Tobias  
**Cc:** Snyder, Jim  
**Subject:** RE: GAPA-TAQ

Thanks Vince,

We are considering whether to request a retest of the FTP. I hope to have the decision in a day or so. Today and tomorrow are holidays in Germany.

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**

**From:** Mazaitis, Vincent [<mailto:mazaitis.vincent@epa.gov>]  
**Sent:** Thursday, May 14, 2015 6:42 AM  
**To:** [REDACTED] **Ex. 7**  
**Cc:** Snyder, Jim  
**Subject:** GAPA-TAQ

Please find enclosed, the Subject information. If you have any questions or concerns, please contact me.

Thank you,

Vince Mazaitis

(734)214-4864

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 5/12/2015 8:22:42 PM  
**Subject:** RE: USEPA Meeting with Volkswagen - Shift Indicator Light

Yes we are still on for tomorrow morning.

**From:** [Ex. 7]@vw.com]  
**Sent:** Tuesday, May 12, 2015 4:20 PM  
**To:** Snyder, Jim  
**Cc:** Wehrly, Linc; Wright, DavidA; Ball, Joel; Dalton, Joel; Pidgeon, Bill  
**Subject:** USEPA Meeting with Volkswagen - Shift Indicator Light  
**Importance:** High

Hello Jim:

I assume that the VW meeting to discuss the SIL topic is still on for tomorrow morning. Mr. [Ex. 7] and I will be there in person. I have set up a conference call number since the presentation will be provided by a colleague in Germany. I would appreciate it if a speaker phone is available in the conference room.

Also, it may be beneficial to drive the car prior to the meeting and start the discussion a bit later; however, this can be done at your option.

Available Call-In Numbers:

**Ex. 7**

Best regards,

**Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: **Ex. 7**

Cell: **Ex. 7**

Fax: **Ex. 7**

E-Mail: **Ex. 7**



**From:** Snyder, Jim  
**Required Attendees:** Wehrly, Linc; Wright, DavidA; Ball, Joel; Dalton, Joel; Pidgeon, Bill  
**Ex. 7**  
**Location:** AA-Room-Office-C126-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** VW SIL light shift schedule survey and test drive.  
**Start Date/Time:** Wed 5/13/2015 1:00:00 PM  
**End Date/Time:** Wed 5/13/2015 2:00:00 PM

When: Wednesday, May 13, 2015 9:00 AM-10:00 AM (GMT-05:00) Eastern Time (US & Canada).  
Where: AA-Room-Office-C126-ConfRoom/AA-OTAQ-OFFICE

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

VW will present results of SIL survey on their new 1.4L manual along with a vehicle to test drive the SIL.

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 5/7/2015 8:57:10 PM  
**Subject:** RE: Audi BEV SUV Request

I've thought about and have been surveying the other cert reps to see if there have been any request on similar setups. This week and next are hectic due to offsite testing so I may not get a chance to respond until later next week at best.

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Wednesday, May 06, 2015 2:53 PM  
**To:** Snyder, Jim  
**Subject:** RE: Audi BEV SUV Request

Hello Jim,

Do you have any feedback for us on the topic below?

Are our interpretations correct in that this fits the requirements for a LDT?

If you need anything further please let me know. Thanks Jim!

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**From:** Allen, Gregory (EEO)

**Sent:** Friday, April 24, 2015 11:33 AM  
**To:** 'Snyder, Jim'  
**Subject:** RE: Audi BEV SUV Request

Hello Jim,

Sorry for the late feedback –

Currently, the ride height setting is planned with a “latching (last mode)” functionality (i.e. if you shut it off in dynamic mode, it will stay in dynamic mode as of now). We spoke with some colleagues and they stated that if it is a determining factor, it is still early enough that they may be able to re-design the functionality to be defaulted to the allroad position. Will this be a factor in EPA classifying this as a LDT?

As for the 2<sup>nd</sup> point, they aren't 100% sure if this will be a “knob” or “button” to change the drive modes. What they did say is that it will be visible to the driver on the IC in a very easy location, so they will know what mode they are in as soon as they start the vehicle.

Please let me know if you have questions on either of these points.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Wednesday, April 22, 2015 11:02 AM  
**To:** Allen, Gregory (EEO)  
**Subject:** RE: Audi BEV SUV Request

Greg, I have a couple questions. Does the ride height setting reset to "Allroad" default on key off or does it stay latched? Is the ride height controlled by a button or knob, or is it through a menu on a display?

**From:** Allen, Gregory (EEO) [<mailto:Gregory.Allen@vw.com>]  
**Sent:** Tuesday, April 21, 2015 4:28 PM  
**To:** Snyder, Jim  
**Subject:** Audi BEV SUV Request

Hello Jim,

As discussed, here is the file name that the request for approval was uploaded to Verify under:

CBI\_Audi CBEV Request for Interpretation

Regards,

Greg Allen

VWGoA EEO

(248)754-4209



**To:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 5/6/2015 9:05:56 PM  
**Subject:** RE: Audi A3 e-tron Charging

We have several plugs that we have used but normally it is the NEMA 6-50 plug that we request attached to your charger. We have 240 volts. I'm told it is a clean, steady source. Do you know when it would be available if I decided to confirm it?

**From:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**Sent:** Wednesday, May 06, 2015 4:26 PM  
**To:** Snyder, Jim  
**Subject:** Audi A3 e-tron Charging

Hello Jim:

Testing of the new Audi A3 e-tron PHEV has begun in Germany. The question of charging plugs available at EPA has come up. I am told, that there are 4 different charge plugs available. They all have the same power support. Would you tell me which plug is available at the EPA lab (nema 14-50, nema 6-50R, nema 6-30P, hard wired)? I am also told that if these plugs are not available we would like to have a hard wired connection. We will make accommodations available on the vehicle side but simply need to know what is available.

The second question is if 240V or 220V is available.

The wallbox that we left at EPA apparently will not work.

(I guess this all assumes that you will call in the vehicle!)

Best regards,

Ex. 7

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: Ex. 7

Cell: Ex. 7

Fax: Ex. 7

E-Mail: Ex. 7

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 5/4/2015 5:17:55 PM  
**Subject:** model names on CoC

[Ex. 7] I got your voicemail regarding adding extra model names to the Certificate due to different names or spelling in other markets. There has been certificates with models that were not even built listed on them (canceled or postponed) so I don't see any issue with listing additional model names on the CoC.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)



**From:** Snyder, Jim  
**Required Attendees:** Glas, Tobias; Pidgeon, Bill  
**Optional Attendees:** Smith, Brett (EEO)  
**Location:** meet by Lab lobby  
**Importance:** Normal  
**Subject:** the IUVP High Altitude testing.  
**Start Date/Time:** Wed 4/29/2015 6:00:00 PM  
**End Date/Time:** Wed 4/29/2015 6:30:00 PM

When: Wednesday, April 29, 2015 2:00 PM-2:30 PM (GMT-05:00) Eastern Time (US & Canada).  
Where: meet by Lab lobby

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

Mtgs seem to be running long this week. I think its safer to push it back to 2:15 or 2:30.

I have mtgs but I'm open after 2:00.

Hi Jim,

I'll be at EPA on Wednesday from 12:30 pm on.

I was wondering if you'll have a couple of minutes to meet because I have a few questions about the IUVP High Altitude testing.

Please let me know.

Best regards

**Tobias Glas**

In-Use Emission Compliance Specialist  
Engineering & Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America

Phone: (248) 754-4211  
Cell: (248) 494-1537

**From:** Snyder, Jim  
**Required Attendees:** Glas, Tobias [Tobias.Glas@vw.com]; Pidgeon, Bill  
**Location:** meet by Lab lobby  
**Importance:** Normal  
**Subject:** the IUVP High Altitude testing.  
**Start Date/Time:** Wed 4/29/2015 6:00:00 PM  
**End Date/Time:** Wed 4/29/2015 6:30:00 PM

When: Wednesday, April 29, 2015 2:00 PM-2:30 PM (GMT-05:00) Eastern Time (US & Canada).  
Where: meet by Lab lobby

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

I have mtgs but I'm open after 2:00.

Hi Jim,

I'll be at EPA on Wednesday from 12:30 pm on.

I was wondering if you'll have a couple of minutes to meet because I have a few questions about the IUVP High Altitude testing.

Please let me know.

Best regards

**Tobias Glas**

In-Use Emission Compliance Specialist  
Engineering & Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America

Phone: (248) 754-4211  
Cell: (248) 494-1537

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 4/27/2015 9:51:28 PM  
**Subject:** RE: Coastdown Audi

Thanks.

**From:** [Ex. 7]@vw.com]  
**Sent:** Monday, April 27, 2015 5:30 PM  
**To:** Snyder, Jim  
**Subject:** RE: Coastdown Audi

Hi Jim:

I received a similar question earlier this year from Linc. My response is attached. Basically, SOP is Calendar Week 34 (mid-August); however, market intro is not before January 2016. I am not sure if a production vehicle can be made available earlier than the official release date or if Audi wishes to keep it under wraps. I'll check.

Regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (Ex. 7)

Cell: (Ex. 7)

Fax: (Ex. 7)

E-Mail: (Ex. 7)

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]

**Sent:** Monday, April 27, 2015 5:04 PM

**To:** (Ex. 7)

**Subject:** Coastdown Audi

(Ex. 7) can you give me a rough estimate of when a production Audi Q7 will be available to us for testing? The chart shows weeks 22 and 34 for related test groups but I'm not sure if that is for the new generation version. Its this year right?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 4/27/2015 9:04:16 PM  
**Subject:** Coastdown Audi

[Ex. 7] can you give me a rough estimate of when a production Audi Q7 will be available to us for testing? The chart shows weeks 22 and 34 for related test groups but I'm not sure if that is for the new generation version. Its this year right?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 4/22/2015 3:01:30 PM  
**Subject:** RE: Audi BEV SUV Request

Greg, I have a couple questions. Does the ride height setting reset to "Allroad" default on key off or does it stay latched? Is the ride height controlled by a button or knob, or is it through a menu on a display?

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Tuesday, April 21, 2015 4:28 PM  
**To:** Snyder, Jim  
**Subject:** Audi BEV SUV Request

Hello Jim,

As discussed, here is the file name that the request for approval was uploaded to Verify under:

CBI\_Audi CBEV Request for Interpretation

Regards,

Greg Allen

VWGoA EEO

(248)754-4209



**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 4/6/2015 8:58:52 PM  
**Subject:** RE: MY2016 Lamborghini GVGAV06.5LLR Certificate

Okay, I'll look it over tomorrow.

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Monday, April 06, 2015 4:40 PM  
**To:** Snyder, Jim  
**Subject:** RE: MY2016 Lamborghini GVGAV06.5LLR Certificate

Hello Jim,

Thanks for your help on this.

I've re-uploaded the corrected application to reflect the CSI changes mentioned below. The rest of the application looked OK. I also generated a new cert request.

Please let me know if you have any further questions. The other model years will be corrected in the coming days.

Thanks Jim

Best Regards,

Greg Allen

VWGoA EEO

(248)754-4209



**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Monday, April 06, 2015 3:37 PM  
**To:** Allen, Gregory (EEO)  
**Subject:** RE: MY2016 Lamborghini GVGAV06.5LLR Certificate

Thanks for sorting that out. I've denied the cert request.

Jim

**From:** Allen, Gregory (EEO) [<mailto:Gregory.Allen@vw.com>]  
**Sent:** Monday, April 06, 2015 2:59 PM  
**To:** Snyder, Jim  
**Subject:** MY2016 Lamborghini GVGAV06.5LLR Certificate

Hello Jim,

Can you deny the cert-request for GVGAV06.5LLR (MY2016 Lamborghini Group we discussed earlier)?

After some internal discussion, it was noted that the applications for MY2013-2015 were incorrect, in that they did not reference the new testing that was done in MY2013 (EPA confirmatory testing) for the LB83-DSSCD Lamborghini that was introduced with cylinder deactivation and start/stop technology. The EPA tests have been used in the fuel economy program since 2013 and they are active tests, however the CSI never got re-ran after the EPA confirmatory tests, and it looks as though that caused the subsequent applications to have the incorrect data.

After the denial, I will change the test data to reflect the EPA confirmatory results and this should resolve the concerns.

The applications for MY2013-2015 will also be updated so that they reference the correct EDV (LB83-DSSCD) and the correct test data.

Please give me a call if you have any questions.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 4/6/2015 7:36:50 PM  
**Subject:** RE: MY2016 Lamborghini GVGAV06.5LLR Certificate

Thanks for sorting that out. I've denied the cert request.

Jim

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Monday, April 06, 2015 2:59 PM  
**To:** Snyder, Jim  
**Subject:** MY2016 Lamborghini GVGAV06.5LLR Certificate

Hello Jim,

Can you deny the cert-request for GVGAV06.5LLR (MY2016 Lamborghini Group we discussed earlier)?

After some internal discussion, it was noted that the applications for MY2013-2015 were incorrect, in that they did not reference the new testing that was done in MY2013 (EPA confirmatory testing) for the LB83-DSSCD Lamborghini that was introduced with cylinder deactivation and start/stop technology. The EPA tests have been used in the fuel economy program since 2013 and they are active tests, however the CSI never got re-ran after the EPA confirmatory tests, and it looks as though that caused the subsequent applications to have the incorrect data.

After the denial, I will change the test data to reflect the EPA confirmatory results and this should resolve the concerns.

The applications for MY2013-2015 will also be updated so that they reference the correct EDV (LB83-DSSCD) and the correct test data.

Please give me a call if you have any questions.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 3/11/2015 5:53:10 PM  
**Subject:** RE: Audi Cert Request Follow up

Yes I see it in the queue. There was another request ahead of it but I completed that one. I will try to get through it by end of Thursday.

Jim

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Wednesday, March 11, 2015 1:34 PM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO)  
**Subject:** Audi Cert Request Follow up

Hi Jim,

As follow up to my phone message, can you give us an update on the status of the following Certification Request.

Test Group: GVGAV02.0AAC

Evap Family: GVGAR0140NAF

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 3/10/2015 2:14:50 PM  
**Subject:** 2.0LVAL SCR approval  
Approved CBI GVGAV02.0VAL RFA SCR R00.pdf

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**VOLKSWAGEN**  
GROUP OF AMERICA

Mr. Jim Snyder  
Certification Representative  
Compliance and Innovative Strategies Division  
U.S. Environmental Protection Agency  
2000 Travenwood  
Ann Arbor, Michigan 48105

Leonard W. Kala Name  
Manager Title  
EEO Department  
248-764-4204 Phone  
248-764-4207 Fax  
leonard.kala@vwa.com E-Mail

February 19, 2015 Date

Ms. Annette Hebert, Division Chief  
Emissions Compliance, Automotive Regulations and  
Science Division (ECAR)  
California Air Resources Board  
9828 Teisler Avenue  
El Monte, California 91731

Subject: Request for Carry Over Approval - Volkswagen Group 2.0L TDI Diesel SCR and  
AECDD Description

Dear Mr. Snyder and Ms. Hebert:

Enclosed for your review is the SCR and AECDD description for certification of the 2016  
Volkswagen Group 2.0L TDI Diesel, Test Group GVGA02.0VAL. This information is  
provided in advance of the submission of the application for certification.

The submission includes the following:

- Request for Approval - SCR Guidance Letter Compliance (Attachment 1)
- AECDD Description Section (Attachment 2)

In general, the SCR request for approval of this submission follows the description in the  
EPA guidance document CID-07-07. If there are any questions regarding these  
materials, do not hesitate to contact me.

Sincerely,  
VOLKSWAGEN GROUP OF AMERICA, INC.

Leonard W. Kala  
Manager  
Emission Regulations and Certification  
Enclosures (2)

REVIEWED AND ACCEPTED  
DATE 3/10/15 REVIEWED [Signature]

VOLKSWAGEN GROUP OF AMERICA, INC.  
2000 TRAVENWOOD  
ANN ARBOR, MI 48105  
PHONE: 248.764.4200

Certification Documentation  
SCR Guidance Letter Compliance



Updated February 2015

## Carry Over Request for Approval SCR Guidance Letter Compliance

To be approved on the following vehicles

Models	Engine	Test Group
Volkswagen Passat, Golf, Golf SportWagen, Jetta, Beetle and Beetle Convertible.	2.0L TDI Common Rail Diesel with SCR	GVGA02.0VAL
Audi A3 and newly added A4		Carry Over from 2015 Model Year with new model added



**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 3/4/2015 10:23:46 PM  
**Subject:** RE: Initial Application for 2016 Audi A6 2.0T Tier 3 BIN125.

Done.

Bill, did you see my note about the missing table 3 in the 3.0L SCR request? Is there a table missing or is that a typo?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Wednesday, March 04, 2015 11:11 AM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Allen, Gregory (EEO)  
**Subject:** FW: Initial Application for 2016 Audi A6 2.0T Tier 3 BIN125.

Hi Jim,

Can you reject the Certificate Request for test group GVGAV02.0AAC please. I need to adjust the composite SFTP family emission limit and resubmit.

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**From:** Rodgers, William (EEO)  
**Sent:** Tuesday, March 03, 2015 10:02 AM  
**To:** "Jim Snyder" ([Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov))  
**Cc:** Giles, Michael; Allen, Gregory (EEO)  
**Subject:** Initial Application for 2016 Audi A6 2.0T Tier 3 BIN125.

Hello Jim,

We have submitted the Initial Application for Certification and Certification Request for the 2016 Audi A6 2.0T test group GVGAV02.0AAC, Tier 3 BIN125 / LEVIII ULEV125.

All new exhaust tests were waived and all Mfr. confirmatory tests have been performed. The Evap Family is carryover from the 2015 Audi A6. Please let me know if you have any questions.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



To: [Ex. 7]@vw.com]  
Cc: [Ex. 7]@vw.com]  
From: Snyder, Jim  
Sent: Wed 3/4/2015 5:54:18 PM  
Subject: RE: Volkswagen Submittals

Thanks [Ex. 7] I found the emails. It shows that I never even opened them so I wonder if they were blocked for a while. I don't remember seeing them but I will look at them now.

From: [Ex. 7]@vw.com]  
Sent: Wednesday, March 04, 2015 10:02 AM  
To: Snyder, Jim  
Cc: [Ex. 7]  
Subject: Volkswagen Submittals

Hello Jim:

This morning we spoke about three requests sent to EPA. I wanted to inquire about the status. It turns out that all three requests were sent to you by e-mail from [Ex. 7] The topics are as follows:

1. [Ex. 7]
2. [Ex. 7]
3. [Ex. 7]

Best regards,

[Ex. 7]

---

# Ex. 7

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: Ex. 7

Cell: Ex. 7

Fax: Ex. 7

E-Mail: Ex. 7

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 3/3/2015 10:49:24 PM  
**Subject:** RE: VW Group Request For Approval - 2.0TDI SCR and AECD

[Ex. 7] On page 7 of the 3.0L SCR approval request, it refers to Tables 2, 4 and 6 regarding driver inducements. I see no Table 6 (or 5). Other than that the 3.0L SCR and DPFRAF requests look reasonable and okay.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [Ex. 7]@vw.com]  
**Sent:** Friday, February 27, 2015 7:38 AM  
**To:** Snyder, Jim  
**Subject:** RE: VW Group Request For Approval - 2.0TDI SCR and AECD

Jim,

There's no concern about the timing because we are well ahead of certification for once. The 3.0L contains changes were the 2.0L is carryover. I suggest starting with the 3.0L in case of questions that need time to get answered.

Thanks,

[Ex. 7]

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Thursday, February 26, 2015 6:19 PM  
**To:** [Ex. 7]  
**Subject:** RE: VW Group Request For Approval - 2.0TDI SCR and AECD

**Ex. 7** I was hoping to get through some of these Diesel approvals this week but too many meetings and I have Friday off. Monday is open though. Do you have any preference of the 2L versus the 3L approvals?

**From:** **Ex. 7** [redacted]@vw.com]  
**Sent:** Thursday, February 26, 2015 9:04 AM  
**To:** Snyder, Jim  
**Cc:** **Ex. 7** [redacted]  
**Subject:** VW Group Request For Approval - 2.0TDI SCR and AECD

Hello Jim,

We have submitted to verify our Request For Approval for the carryover 2016 model year 2.0L TDI diesel SCR/AECD. This involves all VW and Audi 4-cyl. TDI models, including the all-new Audi A4 TDI.

File name: CBI\_GVGAV02.0VAL\_RFA\_SCR\_R00.pdf

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**





**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 2/26/2015 11:19:03 PM  
**Subject:** RE: VW Group Request For Approval - 2.0TDI SCR and AECD

[Ex. 7] I was hoping to get through some of these Diesel approvals this week but too many meetings and I have Friday off. Monday is open though. Do you have any preference of the 2L versus the 3L approvals?

**From:** [Ex. 7]@vw.com]  
**Sent:** Thursday, February 26, 2015 9:04 AM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** VW Group Request For Approval - 2.0TDI SCR and AECD

Hello Jim,

We have submitted to verify our Request For Approval for the carryover 2016 model year 2.0L TDI diesel SCR/AECD. This involves all VW and Audi 4-cyl. TDI models, including the all-new Audi A4 TDI.

File name: CBI\_GVGAV02.0VAL\_RFA\_SCR\_R00.pdf

Regards,

[Ex. 7]

[Ex. 7]

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

[Ex. 7]

**Ex. 7**

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**Cc:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Tue 2/24/2015 4:37:50 PM  
**Subject:** Audi GNU4-VCAQ testing

Greg, I saw the Audi in the lab yesterday. Is anyone from VW coming Wednesday to watch?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 2/18/2015 6:42:21 PM  
**Subject:** RE: 2016 LDT SCR and AECD Request for Approval

Thanks for the heads up. As you know, I don't receive any notification of these document submissions other than notes from you guys.

On another topic, was the Audi A3 available in the US for 2014MY? It was in the Pre-cert mtg charts but I don't see it anywhere else.

Jim

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Wednesday, February 18, 2015 11:00 AM  
**To:** Snyder, Jim  
**Cc:** Allen, Gregory (EEO); Giles, Michael (EEO)  
**Subject:** RE: 2016 LDT SCR and AECD Request for Approval

Jim,

I misinterpreted some information I received about the changes mentioned below. The changes were made to better represent worst case DEF usage and therefore reduce the possibility of customers reaching the no-start warnings.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Rodgers, William (EEO)  
**Sent:** Wednesday, February 18, 2015 8:15 AM  
**To:** "Jim Snyder" ([Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov))  
**Cc:** Allen, Gregory (EEO); Giles, Michael  
**Subject:** 2016 LDT SCR and AECD Request for Approval

Hello Jim,

We have uploaded to Verify a SCR and AECD request for approval document. This request applies request to the 2016 Light-duty Trucks VW Touareg and Porsche Cayenne with 3.0L TDI engines. It is largely carryover information, except for a reduction in the DEF refill interval (from every 10,000 miles to every 5,000 miles) and no-start warning mileage (from 1,500 miles to 1,000 miles). This change was driven by a design change in DEF tank level sensing.

Note - The previously included Audi Q7 TDI is all new for 2016 and will be represented by a separate submission at a later date.

File name: CBI\_GVGAT03.0NU2\_RFA\_SCR\_R00.pdf

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 2/5/2015 2:05:09 PM  
**Subject:** RE: VW MTG: Off Cycle and A/C Credits

The AC17 handout looks good. I think you guys are on track implementing it. Are there more handouts coming? I thought you had something more, about other off cycle credits too.

**From:** [Ex. 7]@vw.com]  
**Sent:** Thursday, February 05, 2015 8:29 AM  
**To:** Snyder, Jim  
**Subject:** RE: VW MTG: Off Cycle and A/C Credits

Yes. That's fine

[Ex. 7]

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Wednesday, February 04, 2015 7:09 PM  
**To:** [Ex. 7]  
**Subject:** RE: VW MTG: Off Cycle and A/C Credits

[Ex. 7], just wanted to make sure you noticed that I pushed the mtg back 30 minutes to 1:00.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [REDACTED] [vw.com]  
**Sent:** Wednesday, February 04, 2015 5:36 PM  
**To:** Snyder, Jim; Wehrly, Linc; French, Roberts; Wright, DavidA; Dalton, Joel; Ball, Joel; Ott, William  
**Cc:** [REDACTED]  
**Subject:** RE: VW MTG: Off Cycle and A/C Credits

To all:

We look forward to meeeting with you tomorrow. There will be a total of four people representing VW ([REDACTED]).

As mentioned, we have two main topics that we wish to discuss.

1. Off-Cycle Technologies – GHG Credit Review
2. Air Conditioning GHG Credits – AC17 Test Planning

Attached is the presentation for the Air Conditioning topic. We are completing the Off-Cycle Technology Credit presentation and will provide this tomorrow morning.

Best regards,

[REDACTED]

---

**Ex. 7**

Engineering and Environmental Office



Volkswagen Group of America, Inc.

Phone:

Cell: (2

Fax: (2

E-Mail:

**Ex. 7**

-----Original Appointment-----

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]

**Sent:** Tuesday, February 03, 2015 1:22 PM

**To:** Snyder, Jim; Wehrly, Linc; French, Roberts; Wright, DavidA;

**Ex. 7**

**Ex. 7**

**Subject:** VW MTG: Off Cycle and A/C Credits

**When:** Thursday, February 05, 2015 1:00 PM-2:30 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** AA-Room-Office-N95-ConfRoom-AAOTAQ-Office

When: Thursday, February 05, 2015 1:00 PM-2:30 PM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-N95-ConfRoom-AAOTAQ-Office

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*



**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 2/3/2015 9:21:37 PM  
**Subject:** RE: Audi Confirmatory Test

Okay, sounds like a plan.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Tuesday, February 03, 2015 3:56 PM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Allen, Gregory (EEO)  
**Subject:** Audi Confirmatory Test

Hi Jim,

I received your phone messages and have since submitted the necessary Supplemental Information to Verify for Audi A6 TDI. We are currently arranging to air freight the test car from Germany and fully expect it to be delivered to EPA on Monday morning February 23<sup>rd</sup> for testing. Thanks for your help.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



**From:** Snyder, Jim

**Required Attendees:** Wehrly, Linc; French, Roberts; Wright, DavidA; Ex. 7  
Ex. 7 Dalton, Joel; Ball, Joel; Ott, William

**Location:** AA-Room-Office-N95-ConfRoom-AAOTAQ-Office

**Importance:** Normal

**Subject:** VW MTG: Off Cycle and A/C Credits

**Start Date/Time:** Thur 2/5/2015 6:00:00 PM

**End Date/Time:** Thur 2/5/2015 7:30:00 PM

When: Thursday, February 05, 2015 1:00 PM-2:30 PM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-N95-ConfRoom-AAOTAQ-Office

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

**From:** Snyder, Jim

**Required Attendees:** Wehrly, Linc; French, Roberts; Wright, DavidA; Ex. 7  
(Ex. 7) Dalton, Joel; Ball, Joel; Ott, William

**Location:** AA-Room-Office-N95-ConfRoom-AAOTAQ-Office

**Importance:** Normal

**Subject:** VW MTG: Off Cycle and A/C Credits

**Start Date/Time:** Thur 2/5/2015 5:30:00 PM

**End Date/Time:** Thur 2/5/2015 7:00:00 PM

When: Thursday, February 05, 2015 12:30 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-N95-ConfRoom-AAOTAQ-Office

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 1/27/2015 7:28:36 PM  
**Subject:** RE: Meeting With Volkswagen

Tuesday morning isn't good but after lunch is okay or Wednesday is open .

**From:** [Ex. 7]@vw.com]  
**Sent:** Tuesday, January 27, 2015 2:25 PM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** Meeting With Volkswagen  
**Importance:** High

Hello Jim:

Thanks for the return message yesterday. I have consulted with my colleagues and they agree that Tuesday, February 3, 2015 would be good. Preferably in the morning. We would like to present EPA with updated materials regarding a previously-submitted off-cycle GHG credit request. We would also like to discuss our plans regarding AC17 testing, particularly since this is the first time we are applying this credit approach.

Please let me know if this works for you. In the past, you have set the date through Outlook in order to reserve an EPA conference room. If you plan to do so this time, please include [Ex. 7] and [Ex. 7]

Best regards,

[Ex. 7]

---

[Ex. 7]

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: **Ex. 7**

Cell: **Ex. 7**

Fax: **Ex. 7**

E-Mail: **Ex. 7**



**To:** Thomas, Richard (EEO)[Richard.Thomas@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 12/15/2014 6:59:00 PM  
**Subject:** RE: Link to lab list

Thanks. I didn't know it was already in Verify. I don't get any notification for submitted documents. I have Dale's note now too.

Jim

**From:** Thomas, Richard (EEO) [mailto:Richard.Thomas@vw.com]  
**Sent:** Monday, December 15, 2014 1:01 PM  
**To:** Snyder, Jim  
**Subject:** RE: Link to lab list  
**Importance:** High

Thank you Jim. I talked to Len about the GHG projections and he said Dale put it into Verify last Wednesday and now he has emailed you a copy of the cover letter with the GHG projections. Let me know if you didn't get it.

Thanks,

Richard

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Monday, December 15, 2014 11:52 AM  
**To:** Thomas, Richard (EEO)  
**Subject:** Link to lab list

<http://www.epa.gov/otaq/consumer/420b13054.pdf>

Of those I know Lotus, Mahle, Continental , Roush, and AVL do some OEM type support work.

Jim Snyder

Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 12/3/2014 4:17:14 PM  
**Subject:** RE: 2014 Common Sections

I don't see any issue with that.

Regarding the lab, they plan to do a normal testing schedule that first week of the year. He said its usually not very busy.

Jim

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Wednesday, December 03, 2014 10:34 AM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Allen, Gregory (EEO)  
**Subject:** 2014 Common Sections

Hello Jim,

I have submitted to Verify the attached Request for Approval for a 90-day extension of our 2014 Final Common Section submittal.

Please let me know if there is any concerns over approving this request.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 12/1/2014 8:18:06 PM  
**Subject:** RE: VW Group - 2016 Application for GVGAV03.0AUE Testgroup

Any news on the GHG report?

-JIM

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Wednesday, November 19, 2014 2:45 PM  
**To:** Snyder, Jim  
**Cc:** Rodgers, William (EEO); Giles, Michael (EEO)  
**Subject:** VW Group - 2016 Application for GVGAV03.0AUE Testgroup

Hello Jim,

Today I submitted to Verify the MY2016 Certification Application for the Audi V6 3.0L TFSI test group GVGAV03.0AUE. The Pre-model year GHG report has not yet been submitted to EPA, but should be submitted within the next week. Also, the Certification Preview meeting is scheduled for tomorrow (11/20/2014 @ 1pm). With these two topics slated to be completed by next week, if you could begin reviewing the application and preparing the Certificate of Conformity for this test group it would be greatly appreciated.

Please let me know if you have any questions / concerns with this.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 11/25/2014 4:27:07 PM  
**Subject:** RE: MY2015 Decision Information Uploaded: FVGAV02.0APA

Just getting to it now. There was quite a few ahead of them from other manufacturers.

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Tuesday, November 25, 2014 10:22 AM  
**To:** Snyder, Jim  
**Subject:** RE: MY2015 Decision Information Uploaded: FVGAV02.0APA

Hello Jim,

Have you had a chance to review the decision information listed below? I haven't seen a decision come across in e-mail or in Verify yet.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**From:** Allen, Gregory (EEO)  
**Sent:** Friday, November 21, 2014 2:32 PM  
**To:** [snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
**Cc:** Rodgers, William (EEO); Giles, Michael (EEO)

**Subject:** MY2015 Decision Information Uploaded: FVGAV02.0APA

Hello Jim,

Today I uploaded test information and decision requests for the vehicles listed below.

Vehicle ID: FAPA-RAF

Configuration: 1

Vehicle ID: FAPA-RMF

Configuration: 1

Both of these are in regards to the running change that was uploaded last week, and to add the Golf 1.8L SportWagen to the FVGAV02.0APA Testgroup as a Fuel Economy Data Vehicle. This testgroups has had the Golf 1.8L FWD and the Audi A3 1.8L FWD Fuel Economy Data Vehicles already confirmed and successfully tested by EPA.

Please inform of us your decision as soon as possible.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO



(248)754-4209

**To:** Rodgers, William (EEO)[[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Mon 11/24/2014 7:39:25 PM  
**Subject:** FW: Audi Diesel  
[23729.pdf](#)

Bill, here is the fuel properties analysis.

In case you are wondering about the ID #s, I asked . The “Fuel Container ID#” is an old style labeling in the computer system. The lab now uses FTAG #. I was assured these are the correct data. Reminds me of the manufacturer code issue...

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Tuesday, November 11, 2014 8:30 AM  
**To:** Snyder, Jim  
**Cc:** Mazaitis, Vincent  
**Subject:** Audi Diesel

Hello Jim,

I’ve been asked to provide our Engineering group with the fuel properties for the diesel fuel that your lab used during the failed tests of VID on Oct 29<sup>th</sup> and Nov 6<sup>th</sup>?

Let me know if you need fuel batch information from the test reports, although we only received the test reports in Verify for the Oct 29<sup>th</sup> tests.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

## NVFEL Fuel Analysis Report

23729

## Cert Diesel 2013

Batch#

Facility Name: Haltermann Facility Type: Wholesale P-C

2565 Plymouth Rd.

Ann Arbor MI 48105

USA

Inspector: Nancy Tschirhart Inspection Date : 9/9/2013

Samples Type: Test Fuel

Inspection information logged in by RG on 9/24/2013.

VOC

Season:

Cert Diesel 2013-9-24-13

FTAG: 23729

Comments:

Test Code	Test Method	Results	Units	Fuel_ Code: 14	Analyst	Analysis Date
430	Sulfur in Diesel by D5453	10.10	Parts Per Million		NS	9/24/2013
65	Percent Evaporated at 200 Degrees F D86	0.0	Volume Percent		RG	9/24/2013
66	Percent Evaporated at 300 Degrees F D86	0.0	Volume Percent		RG	9/24/2013
49	Olefins in by FIA D1319	2.2	Volume Percent		RCG	9/24/2013
49	Olefins in by FIA D1319	2.7	Volume Percent		RCG	9/24/2013
46	Aromatics by FIA D1319	27.9	Volume Percent		RCG	9/24/2013
46	Aromatics by FIA D1319	28.4	Volume Percent		RCG	9/24/2013
69	Specific Gravity @ 60 deg F D4052	0.85145	60/60F		RG	9/24/2013
69	Specific Gravity @ 60 deg F D4052	0.85145	60/60F		RG	9/24/2013
692	Degrees API D4052	34.69	Degrees API		RG	9/24/2013
692	Degrees API D4052	34.69	Degrees API		RG	9/24/2013
691	Density @ 60 deg F D4052	0.85061	g/cm-03 @ 60 deg F		RG	9/24/2013
691	Density @ 60 deg F D4052	0.85061	g/cm-03 @ 60 deg F		RG	9/24/2013
44	Cetane Index D976	46.30	Cetane Index		RCG	9/24/2013
102	IBP Diesel D86	361.6	Degrees F		RG	9/24/2013
111	10 percent Diesel D86	421.5	Degrees F		RG	9/24/2013
151	50 percent Diesel D86	508.6	Degrees F		RG	9/24/2013
191	90 percent Diesel D86	623.7	Degrees F		RG	9/24/2013
210	End Point Diesel D86	668.1	Degrees F		RG	9/24/2013
211	Residue Diesel D86	0.8	mL		RG	9/24/2013
212	Total Recovery Diesel D86	97.7	mL		RG	9/24/2013
213	Loss Diesel D86	1.5	mL		RG	9/24/2013
47	Aromatics in Diesel Fuel SFC D5186	28.2	Mass Percent		LS	9/25/2013
47	Aromatics in Diesel Fuel SFC D5186	28.3	Mass Percent		LS	9/25/2013
422	Sulfur in LS Diesel D2622	0.00108	Weight Percent		NST	10/24/2013
32	Weight Fraction Carbon D3343	0.86819	Weight Fraction		CPU	
222	Flash Point D93	157.0	Degrees F		Paragon	10/4/2013
223	Kinematic Viscosity @ 100 Degrees F D445	2.73	Centistokes		Paragon	9/26/2013
73	Net Heat of Combustion D3338	18447.90	BTU per Pound		CPU	
45	Cetane Number D613	43.0	Cetane Number		Paragon	9/28/2013

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 11/19/2014 10:56:31 PM  
**Subject:** RE: OBD approvals

Though we do require a copy of the OBD Approval letter for Certification, it isn't currently req'd to be in the application. I do highly recommend having the OBD approval letter included in the Part 1 as it speeds up the review process. Your proposal is acceptable as long as you submit the OBD approval letter as a document into Verify.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Tuesday, November 18, 2014 3:45 PM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Allen, Gregory (EEO)  
**Subject:** OBD approvals

Jim,

We have historically included OBD approval letters (typically signed by ARB) in each Initial test group Application for certification. In the case where our OBD approval is running longer than anticipated, is it acceptable if we submitted the Initial test group application to Verify for your review prior to final OBD approval in order to make the best use of the wait time.

If so, we propose that after the OBD approval letter is received, we would then submit the Certification Request to Verify with the answer "yes" given to the OBD approval question. We further propose that in such cases the OBD approval letter would be included in the subsequent Application Update.

What are your thoughts?

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Rodgers, William (EEO)[[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Wed 11/19/2014 7:55:44 PM  
**Subject:** RE: Audi Diesel

Yes I'll send them a reminder.

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Tuesday, November 18, 2014 7:26 AM  
**To:** Snyder, Jim  
**Cc:** Allen, Gregory (EEO); Giles, Michael (EEO)  
**Subject:** RE: Audi Diesel

Hi Jim,

Can you follow up with the lab on our fuel properties request?

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Wednesday, November 12, 2014 1:33 PM  
**To:** Rodgers, William (EEO)  
**Cc:** Mazaitis, Vincent  
**Subject:** RE: Audi Diesel

I've talked to the lab and they are looking into it.

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Tuesday, November 11, 2014 8:30 AM  
**To:** Snyder, Jim  
**Cc:** Mazaitis, Vincent  
**Subject:** Audi Diesel

Hello Jim,

I've been asked to provide our Engineering group with the fuel properties for the diesel fuel that your lab used during the failed tests of VID GNU4\_CAQ on Oct 29<sup>th</sup> and Nov 6<sup>th</sup>?

Let me know if you need fuel batch information from the test reports, although we only received the test reports in Verify for the Oct 29<sup>th</sup> tests.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



**From:** Snyder, Jim  
**Required Attendees:** Wehrly, Linc; Wright, DavidA; Ott, William; Anderson, Tom; Ball, Joel; Dalton, Joel; Pidgeon, Bill; Ex. 7  
**Location:** AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** 2016 VW Group Pre-Cert Mtg (NOT tentative, CONFIRMED)  
**Start Date/Time:** Thur 11/20/2014 6:00:00 PM  
**End Date/Time:** Thur 11/20/2014 8:00:00 PM  
[pre cert letter.pdf](#)

When: Thursday, November 20, 2014 1:00 PM-3:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

I am back in town. Meeting is a go.

Mtg handout attached below:

Assuming I'm back from trip by then.

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Thur 11/13/2014 3:18:44 PM  
**Subject:** RE: Mulsanne Decision

I had some Verify issues but I waived it based on the info you passed on to me.

**From:** Giles, Michael (EEO) [<mailto:michael.giles@vw.com>]  
**Sent:** Thursday, November 13, 2014 9:21 AM  
**To:** Snyder, Jim  
**Subject:** RE: Mulsanne Decision

Hi Jim,

I am just following up on the status of the confirmatory decision for the Mulsanne. If you could let us know when the decision should be available I will let the factories know.

Thanks,

Mike

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Wednesday, November 12, 2014 12:32 PM  
**To:** Giles, Michael (EEO)  
**Subject:** RE: Mulsanne Decision

Thank you, that's what I needed.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency

(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Giles, Michael (EEO) [<mailto:michael.giles@vw.com>]  
**Sent:** Wednesday, November 12, 2014 11:45 AM  
**To:** Snyder, Jim  
**Cc:** Rodgers, William (EEO); Allen, Gregory (EEO)  
**Subject:** Mulsanne Decision

Hello Jim,

As we discussed, we have a decision request and test data submitted for a MY2016 Bentley Mulsanne. You had requested some background information about the new EDV for this test group, and the feedback from the factory was as follows:

- There is a slight modification of the combustion chamber design with higher compression ratio and horsepower.
- The emission control system and exhaust after treatment system is unchanged.
- There was no impact on emission performance as shown by the reported test data
- VW updates EDV's routinely to ensure representative vehicles are used for emissions, FE and OBD.

Please let me know if you have further questions. Otherwise, we await your confirmatory decision.

Thanks,

Mike

Michael Giles

Certification Engineer

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4229

Fax: 248 754 4207

mailto: [Michael.Giles@VW.com](mailto:Michael.Giles@VW.com)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Wehrly, Linc[wehrly.linc@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Wed 11/12/2014 4:26:04 PM  
**Subject:** RE: VW Group - 2016 Certificate Question

Bill, We normally will not issue a Certificate on a Test group that has an emissions failing test until it is resolved. Regardless of which test vehicle it was. VW also needs to present its annual Pre-Cert Mtg. Even with the submit Pre-Cert Letter, I am finding the contained information too minimal at times for making informed decisions.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Tuesday, November 11, 2014 9:42 AM  
**To:** Snyder, Jim  
**Cc:** Allen, Gregory (EEO); Giles, Michael (EEO)  
**Subject:** VW Group - 2016 Certificate Question

Hello Jim,

I submitted to Verify the 2016 Initial Common Sections and Certification Application for the 2016 Audi V6 TDI test group GVG AJ03.0NU4. We expect to provide EPA with a Pre-model year GHG report this week prior to submitting a Certification request for this test group. This test group also includes the newly calibrated 2016 Audi A7 and A6 which recently failed FTP EPA confirmatory tests (configured as A6).

Is the issuance of a Certificate of Conformity still possible considering the pending retests of a fuel economy vehicle?

Note, the test group certification will be based on carryover data from the worst case EDV, 2014 Audi A8L, established in October 2012 from EPA confirmatory testing.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 11/10/2014 1:34:21 PM  
**Subject:** RE: Golf charger

Okay, I'll lock it up then.

**From:** [Ex. 7]@vw.com]  
**Sent:** Friday, November 07, 2014 7:52 AM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** RE: Golf charger

Hello Jim,

We will use it for confirmatory tests in the near future so you can keep the charger at EPA.

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Thursday, November 06, 2014 5:40 PM  
**To:** Ex. 7  
**Subject:** Golf charger

I keep forgetting to mention that I have the Bosch charger at my desk. I assume you want that back some time? Or should I save for the future eGolf confirmatory?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)



**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Thur 11/6/2014 8:34:09 PM  
**Subject:** Audi A7GNU4-CAQ/1 unofficial results

Bill, here are unofficial results so you can see what we have. I know we are all thinking pulling the car makes most sense. If I approve a variant on the missing 2<sup>nd</sup> prep these results become official. I will wait til Monday when I get back to do so. Contact Vince if you decide to pick up the car Friday like you expect and he will sign off on it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 11/4/2014 2:57:23 PM  
**Subject:** FW: VW owner/EPA Inquiry - HEV Recall Affects Fuel economy?

**From:** [Ex. 7]@vw.com]  
**Sent:** Monday, November 03, 2014 4:06 PM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** RE: VW owner/EPA Inquiry - HEV Recall Affects Fuel economy?

Hello Jim,

thanks for the notification, we take customer complaints like this very serious.

Please in the future send inquiries like this to [Ex. 7] the Senior Compliance Manager in the EEO Team with a copy to myself.

J. Lacroy (??) from the In Use team has done this in the past. Did he leave you or does he have a new job within the EPA ?

Can you please give us more details (maybe a copy of the customer email) ?

We especially need the VIN and the location of the customer to investigate the car.

A Fuel economy decline of 4 mpg seems not possible with this Field Fix if performed properly.

If I remember correctly the Calibration flash only opens the clutches in case of a failure so the car can be moved.

We will take all steps necessary to investigate this issue.

[Ex. 7]

Ex. 7

Engineering and Environmental Office

**VOLKSWAGEN Group of America, Inc.**

Ex. 7

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]

**Sent:** Friday, October 31, 2014 2:49 PM

**To:** Ex. 7

**Subject:** VW owner/EPA Inquiry - HEV Recall Affects Fuel economy?

Ex. 7 I'm not sure which of you is the right guy for this one. I have been corresponding with the owner of a 2013 Jetta Hybrid that had the DSG fluid recall done.

(Recall 13V568000: DSG Fluid Replacement), He seems pretty certain that he lost 4mpg since the campaign was performed. From what he says there is a drain and fill to a different trans fluid and corresponding calib. flashing done .

I believe I asked previously if there is indeed a calibration change associated with this campaign and if it potentially affects FE. I can't find the note so I don't know who I asked, not even positive that I sent it. In the mean time it sounds like his case went to arbitration and it came to light that the service may have incorrectly performed . Improper fluid level and no re-flash done.

Perhaps we can get some of this confusion straightened out. The email thread trails back to July. Name is Ex. 6 if that helps. Firstly, can you find out exactly what changes this

recall involves?

1. Is there a Cal change?
2. Does it typically affect FE?
3. Would improper fluid level affect FE?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Tue 11/4/2014 2:56:10 PM  
**Subject:** RE: VW owner/EPA Inquiry - HEV Recall Affects Fuel economy?

Thanks Mike. FYI, Oliver sent me a note too. I'll forward it in case you didn't see it.

**From:** Giles, Michael (EEO) [<mailto:michael.giles@vw.com>]  
**Sent:** Tuesday, November 04, 2014 9:23 AM  
**To:** Snyder, Jim  
**Subject:** RE: VW owner/EPA Inquiry - HEV Recall Affects Fuel economy?

Hi Jim,

I am checking into this and will try to get a response to you soon.

Regards,

Mike

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Friday, October 31, 2014 2:49 PM  
**To:** Giles, Michael (EEO); Glas, Tobias  
**Subject:** VW owner/EPA Inquiry - HEV Recall Affects Fuel economy?

Mike, Tobias, I'm not sure which of you is the right guy for this one. I have been corresponding with the owner of a 2013 Jetta Hybrid that had the DSG fluid recall done.

(Recall 13V568000: DSG Fluid Replacement), He seems pretty certain that he lost 4mpg since

the campaign was performed. From what he says there is a drain and fill to a different trans fluid and corresponding calib. flashing done .

I believe I asked previously if there is indeed a calibration change associated with this campaign and if it potentially affects FE. I can't find the note so I don't know who I asked, not even positive that I sent it. In the mean time it sounds like his case went to arbitration and it came to light that the service may have incorrectly performed . Improper fluid level and no re-flash done.

Perhaps we can get some of this confusion straightened out. The email thread trails back to July. Name is Ex. 6 if that helps. Firstly, can you find out exactly what changes this recall involves?

1. Is there a Cal change?
2. Does it typically affect FE?
3. Would improper fluid level affect FE?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 11/3/2014 7:26:26 PM  
**Subject:** RE: Audi A7 Confirmatory Retest

Okay, submitted.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Monday, November 03, 2014 2:21 PM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Allen, Gregory (EEO)  
**Subject:** Audi A7 Confirmatory Retest

Hello Jim,

I left you a phone message also. In addition to the planned FTP retest, Audi would like to retest the US06 cycle as well.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)





**To:** [Ex. 7]  
**From:** Snyder, Jim  
**Sent:** Fri 10/31/2014 6:06:40 PM  
**Subject:** RE: A7 test schedule follow up

Yes, The NMOG on the FTP city test exceeded the Calif. 50K std so I have requested a re-test of the FTP.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [Ex. 7]@ww.com]  
**Sent:** Friday, October 31, 2014 10:22 AM  
**To:** Snyder, Jim; Mazaitis, Vincent  
**Cc:** [Ex. 7]  
**Subject:** A7 test schedule follow up

Hello Jim and Vince,

Bill is out today so I am following up on the status of the A7 which tested this week.

I understand that after some follow up discussion Thursday afternoon with Bill, we had requested a re-test for this vehicle.

Can you confirm and let us know the test schedule as soon as it is available.

Thanks,

**Ex. 7**

**Ex. 7**

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone:

Fax:

mailto:

**Ex. 7**

To: [Ex. 7]@vw.com [Ex. 7]  
[Ex. 7]@vw.com]

**From:** Snyder, Jim  
**Sent:** Tue 10/28/2014 9:46:26 PM  
**Subject:** SIL Survey and Shift Schedules

[Ex. 7] upon further reviewing the Guidance CISC-09-19, A/C 72A and your presentation, I don't think what VW is proposing is line with the procedure as defined by the current Guidance.

It appears VW would like to compare the shift point results of the survey and if it meets the predominate mode criteria, use the SIL points for the testing shift schedules. What the Guidance defines is to collect shift point data of multiple drivers on the survey route who are influenced by the SIL to varying degrees. The data analysis of the survey results will account for how much the surveyed drivers followed the SIL. The Shift points in the shift schedules for emissions testing will be based on the survey results. The more realistic the SIL settings, the closer the survey results will be to SIL's shift points.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 10/27/2014 5:29:40 PM  
**Subject:** RE: A7 Fan Configuration Feedback

Thanks Mike, I passed it on to the lab.

-Jim

**From:** Giles, Michael (EEO) [mailto:michael.giles@vw.com]  
**Sent:** Monday, October 27, 2014 1:22 PM  
**To:** Snyder, Jim  
**Cc:** Rodgers, William (EEO); Schuetze, Michael (N/EA-521)  
**Subject:** A7 Fan Configuration Feedback

Hello Jim,

I discussed your question about the fans with Bill. We should use single fan configurations for this vehicle, as was described in the VERIFY data sets.

The double fan configuration only applies to the SUV vehicles which have twin cooling air intakes on the front of the vehicle.

Let me know if there are other questions.

Regards

Mike

Michael Giles

Certification Engineer

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4229

Fax: 248 754 4207

mailto: [Michael.Giles@VW.com](mailto:Michael.Giles@VW.com)

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 10/15/2014 9:18:37 PM  
**Subject:** RE: EPA Scan Tool

I talked to Ben today and he uses a handheld scanner. Its an Autoxray. An older version of the EZ Scan 6000.

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Tuesday, October 14, 2014 4:10 PM  
**To:** Snyder, Jim  
**Subject:** RE: EPA Scan Tool

Hello Jim,

Did you get confirmation from Ben yet about which scanners are used for our cars?

Filtering through old e-mails and I believe this one fell through the cracks.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**From:** Allen, Gregory (EEO)  
**Sent:** Monday, July 28, 2014 3:41 PM  
**To:** 'Snyder, Jim'  
**Subject:** RE: EPA Scan Tool

Yes the Confirmatory testing of new cars. If you could check with Ben and see what is used for our vehicles I would appreciate it.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]

**Sent:** Monday, July 28, 2014 3:28 PM

**To:** Allen, Gregory (EEO)

**Subject:** RE: EPA Scan Tool

Are you referring to the Certification confirmatory testing of new cars, or the in-use tests that Lynn Sohacki does?

The cert cars just get a quick code check by Ben Haynes. He uses a simple handheld scanner and that's it. I think it's an Autoxray brand but I can check.

Now the contractor that inspects the in-use cars has several higher level scan tools that they use for the in-use inspections. Tobias would know what they have better than me.

-Jim

**From:** Allen, Gregory (EEO) [<mailto:Gregory.Allen@vw.com>]  
**Sent:** Monday, July 28, 2014 3:11 PM  
**To:** Snyder, Jim  
**Subject:** EPA Scan Tool

Hello Jim,

Can we get the make/model of the type of Scan tools EPA uses to check our cars out before testing? We talked with one of the gentlemen in the lab doing the drive trace last time we were at EPA, and he mentioned that usually they use a generic scan tool, but that he thought for our cars they might be using a laptop with some software on it. We talked to Vince afterwards and he said he didn't know of them using a laptop to do any readouts.

We are trying to get an idea of what EPA uses so we can mirror the readouts here before the vehicle gets delivered.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209



**To:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 10/9/2014 10:22:52 PM  
**Subject:** RE: VW Durability Plan for 2016  
vw 2016 approved durability letter.pdf

Attached.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**Sent:** Tuesday, September 09, 2014 10:32 AM  
**To:** Snyder, Jim  
**Cc:** [REDACTED] Ex. 7 [REDACTED]  
**Subject:** VW Durability Plan for 2016

Hello Jim,

We have uploaded to the Verify system a request for EPA approval relating to the carryover of VW Group's Durability Plan for the 2016 model year. Please review and approve this plan at your earliest convenience.

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U.S. Environmental Protection Agency  
2000 Traverwood  
Ann Arbor, Michigan 48105

Leonard W. Kata Name  
Manager Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
Leonard.Kata@vw.com E-Mail  
September 8, 2014 Date

Subject: Request for Approval - Carryover of Durability Procedures for the 2016 Model Year

Dear Mr. Snyder:

The following request is submitted by the Volkswagen Group of America, Inc. ("Volkswagen"). On September 29 and October 23, 2006, Volkswagen submitted documents requesting approval of the Volkswagen Alternative Durability Procedure (VW ADP), applicable to 2008 and subsequent model years, in accordance with the requirements at 40 CFR 1823.05. The U.S. Environmental Protection Agency ("EPA") issued an approval dated December 4, 2006.

In addition, Volkswagen has presented the Volkswagen Group Bench Aging Test Procedure to EPA and requested the use of this procedure for a Lamborghini Test Group on December 28, 2010. On March 16, 2011 Volkswagen submitted a request for approval of an alternative bench aging cycle, referred to as the Lamborghini Bench Aging Cycle. EPA issued an approval on August 20, 2011.

EPA Manufacturers Guidance Correspondence CUSD-07-05 states that EPA must be notified in writing, of the intent to carry-over approved durability procedures for subsequent years. At this time, Volkswagen requests approval of the carry-over of the previously approved VW ADP, the Volkswagen Group Bench Aging Test Procedure, and the Lamborghini Bench Aging Cycle.

For the 2016 model year, 33 out of 34 total test groups will be carry-over test groups. The new diesel test group does not represent any technology that is not expected to demonstrate durability characteristics that differ from previously-certified vehicles. Volkswagen maintains that the current VW ADP, and Bench Cycle, as originally presented to EPA are more severe than the Standard Road Cycle, and continue to be representative.

<sup>1</sup> In this case, the Volkswagen Group is represented by Volkswagen, Audi, Bentley, Lamborghini, and Bugatti vehicles in the United States.

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 SHAWAN ROAD  
ANN ARBOR, MI 48106  
PHONE: 248 754 5000

As described in prior model years, Volkswagen also employs the Standard Road Cycle, primarily for certification of certain diesel-powered test groups. Volkswagen also uses assigned deterioration factors for certain small-volume test groups. We, therefore, take this opportunity to inform the agency of this practice.

Your consideration of this request for carry-over of the previously-approved durability procedures is appreciated.

Best regards,  
VOLKSWAGEN GROUP OF AMERICA, INC.

*Leonard W. Kata*  
Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office

RENEWED AND ACCEPTED  
DATE 10/9/14 EPA REP *[Signature]*

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 10/9/2014 10:07:49 PM  
**Subject:** RE: 2016 VW Group SCR/AECD RFA

Bill, was reviewing the attached revised document and found some issues.

1. Page 13 is missing reference to page #s
2. Page 24 is blank, missing the chart
3. Page 24 of AECD doc , figure 10 is missing freeze graph.

Are there other SCR/AECD approval requests submitted besides this one? I haven't looked in Verify yet.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Friday, October 03, 2014 9:45 AM  
**To:** Snyder, Jim  
**Cc:** Allen, Gregory (EEO); Giles, Michael (EEO)  
**Subject:** RE: 2016 VW Group SCR/AECD RFA

Hello Jim,

The mentioned request for approval document has been revised to include the following changes:

- Pages 10-11, changes to reflect that dealer directories are no longer placed in vehicles at delivery and where owners can find reducing agent.
- Attachment Table 1-2 amended with Porsche instrument cluster graphics.
- Attachment Figure 1 revised to reflect a new two-tank SCR system design for 2016MY Audi A8/A8L models (similar to previous Q7 SUV models).

Please let me know if you have any questions regarding this document.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Rodgers, William (EEO)  
**Sent:** Monday, September 29, 2014 8:45 AM  
**To:** "Jim Snyder" ([Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov))  
**Cc:** Allen, Gregory (EEO); Giles, Michael  
**Subject:** 2016 VW Group SCR/AECD RFA

Hello Jim,

I have uploaded our 2016 VW Group V6 diesel SCR/AECD request for approval to Verify. Please review and approve this document at your earliest convenience. The associated file name is: CBI\_GVGAJ03.0NU4\_RFA\_SCR\_R00

Please let me know if there are any questions or concerns with this information.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 10/7/2014 4:11:45 PM  
**Subject:** Grundler mtg

I just checked his calendar and Byron's mtg with Chris Grundler is from 2 to 4:00.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Thur 10/2/2014 7:53:19 PM  
**Subject:** FW: eGolf Friday drop off

Mike , just realized Ben's not in on Friday so your contact will be Ben's new backup, Dale Wilson (214-4426), or John Spieth 214-4460 (supervisor). Unfortunately neither Dan McBryde nor Arlene are in Friday but she mentioned you or Hannah may want to be around earlier in the day Monday ( before prep) when they check out the charging .

**From:** Snyder, Jim  
**Sent:** Thursday, October 02, 2014 3:47 PM  
**To:** Spieth, John; Wilson, Dale  
**Cc:** McBryde, Dan; Smithson, Arlene; Mazaitis, Vincent; 'Giles, Michael (EEO)'  
**Subject:** eGolf Friday drop off

John, Dale,

Hannah and Mike Giles of VW are dropping off the Electric Golf Friday (tomorrow). Since Ben won't be in Friday I assume one of you can accept delivery and get it inside the lab area for check in. Its scheduled to prep on Monday.

If there are any Questions or issues you can contact Mike Giles at 248-754-4229 ([michael.giles@vw.com](mailto:michael.giles@vw.com))

or

Bill Rodgers

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Spieth, John[Spieth.John@epa.gov]; Wilson, Dale[Wilson.Dale@epa.gov]  
**Cc:** McBryde, Dan[mcbryde.dan@epa.gov]; Smithson, Arlene[smithson.arlene@epa.gov];  
Mazaitis, Vincent[mazaitis.vincent@epa.gov]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 10/2/2014 7:46:42 PM  
**Subject:** eGolf Friday drop off

John, Dale,

Hannah and Mike Giles of VW are dropping off the Electric Golf Friday (tomorrow). Since Ben won't be in Friday I assume one of you can accept delivery and get it inside the lab area for check in. Its scheduled to prep on Monday.

If there are any Questions or issues you can contact Mike Giles at 248-754-4229  
([michael.giles@vw.com](mailto:michael.giles@vw.com))

or

Bill Rodgers

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Thur 10/2/2014 1:26:43 PM  
**Subject:** RE: dyno Road load derivation

## Non-Responsive

**From:** Giles, Michael (EEO) [<mailto:michael.giles@vw.com>]  
**Sent:** Thursday, October 02, 2014 9:19 AM  
**To:** Snyder, Jim  
**Subject:** RE: dyno Road load derivation

Sorry, I guess we will get the story in the meeting.

I am heading over to dial in to now.

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Thursday, October 02, 2014 9:09 AM  
**To:** Giles, Michael (EEO)  
**Subject:** RE: dyno Road load derivation

Any news ?

**From:** Giles, Michael (EEO) [<mailto:michael.giles@vw.com>]  
**Sent:** Thursday, October 02, 2014 8:11 AM  
**To:** Snyder, Jim  
**Subject:** RE: dyno Road load derivation

Thanks Jim.

We expect the documentation soon. I hope to receive it and send to you in advance of the phone call.

Mike

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Wednesday, October 01, 2014 6:51 PM  
**To:** Giles, Michael (EEO)  
**Subject:** dyno Road load derivation

Hi Mike, I spent a fair amount of time discussing this with Carl, can't say we reached agreement but I think we are at least a little more open to their explanation.

If Germany doesn't convince us with their paper, or we can't get the RLD's inertial adjustment set to 0%, I think our fall back is for them to recalculate their coastdown Target coefficients using the standard 3% inertial factor in the calculations and then we run the RLD with the standard 3% inertia adjustment.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Snyder, Jim  
**Location:** Online Meeting  
**Importance:** Normal  
**Subject:** Accepted: e-Golf Dyno Follow up  
**Start Date/Time:** Thur 10/2/2014 1:30:00 PM  
**End Date/Time:** Thur 10/2/2014 2:00:00 PM

**To:** Thomas, Richard (EEO)[Richard.Thomas@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 10/1/2014 12:43:42 PM  
**Subject:** FW: Certificate Number FVGAV00.0VZZ-045 with Evaporative Family N/A has been issued

In case you didn't get a notice...

-----Original Message-----

From: VerifyAdministrator@verifyprod.rtpnc.epa.gov  
[mailto:VerifyAdministrator@verifyprod.rtpnc.epa.gov]  
Sent: Wednesday, October 01, 2014 8:42 AM  
To: Wright, DavidA; Snyder, Jim  
Subject: Certificate Number FVGAV00.0VZZ-045 with Evaporative Family N/A has been issued

Certificate Number FVGAV00.0VZZ-045 with Evaporative Family N/A has been issued. A copy of the signed certificate is attached below.

[https://verifyprod.rtpnc.epa.gov/cert\\_pdf/display?industry=ld&certId=5205](https://verifyprod.rtpnc.epa.gov/cert_pdf/display?industry=ld&certId=5205)

**From:** Snyder, Jim  
**Required Attendees:** Wehrly, Linc; Ott, William; Wright, DavidA; Paulina, Carl; Giles, Michael (EEO)  
**Optional Attendees:** Smithson, Arlene; McBryde, Dan  
**Location:** AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** Lab testing the BEV VW Golf  
**Start Date/Time:** Wed 10/1/2014 1:30:00 PM  
**End Date/Time:** Wed 10/1/2014 2:30:00 PM

When: Wednesday, October 01, 2014 9:30 AM-10:30 AM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

We've covered most of this already but its a chance to ask or answer any questions. We have another meeting at 10 so hopefully this won't run long.

We could plan to do the meeting in a 30 minute window or maybe an hour if you can spare it.

Topics:

- Charging box connection
- Driving mode review
- Road load coefficients / dyno setup review
- Anticipated Testing schedule

Please let us know when you are available for the discussion and I will set up a dial in number.

Thanks,  
Mike

Michael Giles

**To:** Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 9/22/2014 5:44:31 PM  
**Subject:** RE: VW Group - eGolf supporting information

Mike, I forwarded the reply about the charger to the lab. I talked to Vince about the scheduling and he'll look into it.

I read the Mode doc but it didn't say if the different regen modes latch or if there is a default setting on key on.

**From:** Giles, Michael (EEO) [mailto:michael.giles@vw.com]  
**Sent:** Thursday, September 18, 2014 3:28 PM  
**To:** Snyder, Jim  
**Subject:** VW Group - eGolf supporting information

Hello Jim

As we discussed, I am sending you some supporting information for the e-Golf.

1) Installation operation instructions for the wall charger. In addition, please see related text below with explanation from the factory:

1) I spoke with our Electrical experts here and once again clarified the need for permanent installation. Below are the 2 points they referred in the Bosch Instruction Manual (attached) which mention following local safety standards, and the grounding instructions. It was explained to me that due to a DIN standard here in Europe they are not allowed to install an external plug due to the risk imposed if someone were to then plug it in outdoors where snow/water can effect it. That is why we were unable to outfit this wallbox with an external plug. There should be no functional difference between the 2 installation methods, but of course we would prefer the hard installation.

a. If EPA is willing to take on the risk of external plug installation, they can do so. If they decide to use this approach, please find out which NEMA connector they are using.



b. Also, it's worth noting that Bosch does not offer this charger as a plug-in option due to the same safety reasons.

- ▶ Make sure that the materials used and the installation procedures follow local building codes and safety standards.

---

## **4.2 Grounding Instructions**

This product must be connected to a grounded, metal, permanent wiring system; or an equipment grounding conductor must be run with the circuit conductors and connected to the equipment grounding terminal or lead on the product.

---

2) PDF file with a description of the driving modes

3) Dyno setup: As we discussed, the factory has stated that rotating mass has already been accounted for in the vehicle dyno coefficients. VW is requesting that EPA describe the dyno setup process so that we can confirm our understanding of how this will be done and avoid any misinterpretation.

Thanks,

Mike

Michael Giles

Certification Engineer

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4229

Fax: 248 754 4207

mailto: [Michael.Giles@VW.com](mailto:Michael.Giles@VW.com)

**To:** Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 9/18/2014 5:50:30 PM  
**Subject:** FW: New Confirmatory Test Decision Information submitted (VW370-7-40168 / 0)

Whats the difference between the to submissions? Look the same to me.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

-----Original Message-----

From: VerifyAdministrator@verifyprod.rtpnc.epa.gov  
[mailto:VerifyAdministrator@verifyprod.rtpnc.epa.gov]  
Sent: Thursday, September 18, 2014 1:42 PM  
To: Mazaitis, Vincent; Wright, DavidA; Snyder, Jim  
Subject: New Confirmatory Test Decision Information submitted (VW370-7-40168 / 0)

PLEASE DO NOT REPLY TO THIS EMAIL!

A new Confirmatory Test Decision Information dataset was submitted. A decision needs to be made for the following vehicle:

Manufacturer: VGA  
Vehicle ID: VW370-7-40168  
Vehicle Configuration: 0

This submission has not been randomly selected for testing.

Click on the link below to make a decision in Verify.

<https://verifyprod.rtpnc.epa.gov/verify-web/cft/ld/decisionInfoUpdateRetrieve.do?decisionDatasetId=5803>

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Thur 9/18/2014 3:03:51 PM  
**Subject:** BEV sample test submission  
[BEV sample test submission .pdf](#)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

## Example - Charge Depleting Data for an Electric Vehicle



## Verify: Engine and Vehicle Compliance System

U.S. Environmental Protection Agency 8/9/12

Welcome, David Good. Today is Monday, November 28, 2011 (ET)

VERIFY Intranet Home

Home &gt; Light-Duty Vehicle &amp; Truck &gt; Search for Test Information &gt; Test Information Search Results &gt; Test Information Details

[Back](#) [Help](#) [Logout](#)

## Test Information Details

Record Number:

&lt;&lt; &lt; &gt; &gt;&gt;

of 0

Search

Search Results

## Test Information EPA Tab

## General Information

Process Code	Correction Submission	Mfr Code	Ex. 6
Test Number	Ex. 6	Exhaust Evap Test Number Link	
Vehicle ID / Configuration	Ex. 6	Test Date	2011-06-15

## EPA Only Fields

Dataset Status	Active	Submission Date	11/21/2011
Test Category	Charge Depleting	LOD Test Number	
EPA Dyno Number		Test 5-Cycle Category	Not 5-Cycle

## Test Particulars

Test Procedure	81 - Charge Depleting UDDS	Test Fuel Type	62 - Electricity
Verify Test Lab ID	1	Odometer Units	M
Test Start Odometer Reading	300	AWD Test Dyno	No
State of Charge Delta Indicator	No	Fuel Batch ID	Ex. 6
Fuel Batch Mfr Code	Ex. 6	Diesel Adjustment Factor	Downward
Fuel Batch Calibration Number	1101	Usage	
Retest Indicator	No	Retest Reason	N/A
Verify Test Number That Was Retested		Manufacturer Confirmatory Test?	No
Original Manufacturer Verify-Test Number That Was Confirmed			

## Analytically-Derived FE / CREE

Analytically Derived?	No	ADFE Base Verify Test Number	
ADFE Total Road Load Horsepower	N/A	ADFE ETW	N/A
ADFE N/V Ratio	N/A		

## PHEV/Charge Depleting Test Information

Recharge Event Voltage	240	Recharge Event Energy (kiloWatt-hours)	18.3012
Charge Depleting Range (Calculated miles)	97.935	Charge Depleting Range (Actual miles)	97.935
Equivalent All Electric Range (miles)	97.935	Number of Charge Depleting Bags / Phases Conducted	1
Fuel Economy Value Units	miles per gallon		

## Test Results

UDDS/Highway/US06 Bag/Phase Number 1

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	97.935	-
AMP-HRS ( Integrated Amp-hours )	0	-
AS-VOLT ( Average System Voltage )	0	-
CO ( Carbon Monoxide )	0	-
CO2 ( Carbon dioxide )	0	-
CREE ( Carbon-Related Exhaust Emissions )	0	-
END-SOC ( System End State of Charge )	0	-

Amp <del>Watt</del> (hours)		
HC-TOTAL (Total Hydrocarbon)	0	
MFR FE (Manufacturer Fuel Economy)	180.4	180.4
NOX (Nitrogen Oxide)	0	
START-SOC (System Start State of Charge)	0	
Amp <del>Watt</del> (hours)		

Note: Verify doesn't perform this calculation. Verify currently defaults to the mfr's value

Verify-Calculated Fields

System Miles 289

Fuel Economy

Unrounded Unadjusted Fuel Economy	-	Rounded Unadjusted Fuel Economy	-
Unrounded Adjusted Fuel Economy	-	Rounded Adjusted Fuel Economy	-

CREE / OPT-CREE

Unrounded Unadjusted CREE	-	Rounded Unadjusted CREE	-
Unrounded Adjusted CREE	-	Rounded Adjusted CREE	-
Unrounded Unadjusted OPT-CREE	-	Rounded Unadjusted OPT-CREE	-
Unrounded Adjusted OPT-CREE	-	Rounded Adjusted OPT-CREE	-

Manufacturer Test Comments

This is official EPA confirmatory data. (Temporarily, inputted by Mfr.) UDDS AER(mile):97.935 , AC Energy(kWh/100mile):18.6705

[View Related Confirmatory Test Decision Information](#)

EPA@Work Home | EPA Home | Accessibility

URL: <https://verify-as1.nvfel-pmn1.epa.gov:8080/verify-web/cft/ld/testInfoUpdateRetrieve.do>

$$\text{MFR FE} = \frac{33.705 \left( \frac{\text{kW-hr}}{\text{gal}} \right) \times \text{charge depleting range (miles)}}{\text{Recharge Event Energy (kW-hr)}}$$

ASTM Round to tenths  
(units are MPGe)

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 9/11/2014 7:59:50 PM  
**Subject:** RE: VW - e-Golf Test Data

Okay.

**From:** [Ex. 7]@vw.com]  
**Sent:** Thursday, September 11, 2014 3:13 PM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** VW - e-Golf Test Data

Hello Jim and Ben,

After requesting a status update from the factory, we were informed to expect test data for submission on Tuesday of next week.

Thanks for the follow up earlier today. We will discuss further next week.

Regards

[Ex. 7]

[Ex. 7]

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: **Ex. 7**

Fax: **Ex. 7**

mailto: **Ex. 7**



**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 9/10/2014 1:54:08 PM  
**Subject:** RE: VW Durability Plan for 2016

Thanks, I'll look it over.

**From:** [Ex. 7]@vw.com]  
**Sent:** Tuesday, September 09, 2014 10:32 AM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** VW Durability Plan for 2016

Hello Jim,

We have uploaded to the Verify system a request for EPA approval relating to the carryover of VW Group's Durability Plan for the 2016 model year. Please review and approve this plan at your earliest convenience.

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**



**To:** [Ex. 7]@vw.com]  
**Cc:** [Ex. 7]@vw.com]; [Ex. 7]  
[Ex. 7]  
[Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 9/8/2014 9:18:28 PM  
**Subject:** RE: VW Group - e-Golf Testing

For the week of the Technology Showcase, the lab plans to do normal testing Tuesday and Wednesday but Thursday won't run much if at all. So its possible that it could get tested that week though it may not complete that week. I will send the lab an official note saying that you'd like to test that week but nothing is guaranteed until an official waiver request is submitted and scheduled.

I no luck with the other questions yet. Will pursue Conditional and Engineer/hunting season questions tomorrow.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [Ex. 7]@vw.com]  
**Sent:** Friday, September 05, 2014 2:56 PM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** VW Group - e-Golf Testing

Hello Jim,

This is a follow up on the status of testing for our e-Golf (BEV) which we had discussed earlier this summer.

We are now expecting manufacturer test results in the next few weeks, at which time we will also prepare the application paperwork. It has been our understanding (based on previous communications) that EPA intends to call this vehicle in for confirmatory testing. Could you confirm that this is still the case?

Assuming yes, we would like to request that the testing occur the week of October 6<sup>th</sup> if available. We understand that EPA cannot make a fixed schedule prior to supplemental data submission, however if you could let us know of current lab availability at that time , and let the lab know of our intentions, it would be appreciated.

Regards,

Mike

**Ex. 7**

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone:

Fax:

mailto:

**Ex. 7**

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 9/4/2014 6:59:37 PM  
**Subject:** RE: Confirmatory Test Date set - Vehicle ID: GNU4-CAQ

Ben has rescheduled it to 29 Oct, 14.

-----Original Message-----

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Thursday, September 04, 2014 7:17 AM  
**To:** Snyder, Jim  
**Cc:** Allen, Gregory (EEO); Giles, Michael (EEO)  
**Subject:** FW: Confirmatory Test Date set - Vehicle ID: GNU4-CAQ

Hello Jim,  
We would like to request a rescheduling of the upcoming confirmatory tests below to Wednesday, October 29th, with vehicle delivery to EPA on October 27th.  
Please let us know if this is possible.

Thanks,

Bill Rodgers  
VWGoA EEO  
(248) 754-4219

-----Original Message-----

**From:** no-reply@epa.gov [mailto:no-reply@epa.gov]  
**Sent:** Wednesday, September 03, 2014 8:28 AM  
**To:** Thomas, Richard (EEO); Rodgers, William (EEO); Allen, Gregory (EEO); Giles, Michael (EEO)  
**Subject:** Confirmatory Test Date set

The following is a courtesy copy of status message for a Verify submission. Any references made to links refer to links which will appear in the CDX Inbox message.

Confirmatory Test Date has been set for the following vehicle :

Manufacturer: VGA  
Vehicle ID: GNU4-CAQ  
Vehicle Configuration: 1

The test date is 10/16/2014.

The Verify submission this message relates to has the following values:

Vehicle ID: GNU4-CAQ

Vehicle Configuration #: 1

Test Group Name: GVGAJ03.0NU4

The following transaction identifier has been assigned to this request:

**Non-Responsive**

Please do not reply to this message.

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 9/2/2014 9:13:35 PM  
**Subject:** RE: VW Group - Test Decision Information Audi A6 and A7 TDI

Bill, it looks like the target and sets are backwards on this vehicle (GNU4-CAQ). Can you correct the Supplemental data so Ben can schedule it?

		Target Coefficients			Set Coefficients		
		A	B	C	A	B	C
City/Highway	-5.845		0.15409	0.016238	39.117	0.34725	0.016878
Evap							
US06	-5.845		0.15409	0.016238	39.117	0.34725	0.016878
Cold CO	-5.261		0.1695	0.017862	43.028	0.38197	0.018566

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO) [Ex. 7]@vw.com  
**Cc:** [Ex. 7]@vw.com  
**From:** Snyder, Jim  
**Sent:** Thur 8/28/2014 7:59:54 PM  
**Subject:** RE: VW Group - Test Decision Information Audi A6 and A7 TDI

Hi [Ex. 7] and co, It turned out the lighter config was a random so I requested testing. As you know, since this is a 2016 model and diesel, we have the usual new model year hurdles to get through before a new Certificate can be approved.

- [REDACTED] We have to have a Manufacturer's Pre-Cert mtg to inform EPA of new vehicles, models, and new technology coming.
- [REDACTED] Request for Approval of VW's ADP durability process.
- [REDACTED] Request for Approval of VW's diesel AECDs and SCR technologies

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [Ex. 7]@vw.com  
**Sent:** Thursday, August 28, 2014 2:13 PM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** VW Group - Test Decision Information Audi A6 and A7 TDI

Hello Jim,

I submitted Verify decision information files and new fuel economy tests for 2016 model year Audi A6/A7 models. These models will be included in the 3.0L V6 diesel carryover test group GVGAJ03.0NU4, scheduled for market introduction in early 2015 calendar year. These new



tests represent an increased ETW for the A7 models and new predominate mode of operation for both models that includes the Start/stop system activate (On) automatically upon start-up. Let me know if you have any questions.

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**

**To:** Glas, Tobias[Tobias.Glas@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 8/20/2014 5:30:40 PM  
**Subject:** RE: 140517286

Yes, I heard it was just a connector issue. Thanks for getting this resolved. That guy was very insistent.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Glas, Tobias [mailto:Tobias.Glas@vw.com]  
**Sent:** Wednesday, August 20, 2014 12:56 PM  
**To:** Snyder, Jim  
**Subject:** RE: 140517286

Hi Jim,

The Problem on the car was a pushed back pin that had some tools make a connection and some didn't.

The problem is solved and the customer is happy.

Thank you

**Tobias Glas**

In-Use Emission Compliance Specialist

Engineering & Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone: (248) 754-4211

Cell: (248) 494-1537

Fax: (248) 754-4207

E-Mail: [Tobias.Glas@vw.com](mailto:Tobias.Glas@vw.com)

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]

**Sent:** Tuesday, July 29, 2014 1:10 PM

**To:** Glas, Tobias

**Subject:** RE: 140517286

Yes, I would appreciate it. It is not just me, he is calling Joel Ball and an OBD guy every day.

**From:** Glas, Tobias [<mailto:Tobias.Glas@vw.com>]

**Sent:** Tuesday, July 29, 2014 1:08 PM

**To:** Snyder, Jim

**Subject:** RE: 140517286

Well, at least he is determined! If it is ok with you I'll contact him today to get him off your back.

Thanks

Tobias

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Tuesday, July 29, 2014 1:07 PM  
**To:** Glas, Tobias  
**Subject:** RE: 140517286

Hi Tobias, I hope you were able to convince your regional manger how important it is to contact this guy, **Ex. 6** quickly. He is calling and emailing several of us every day! He wants to know when he will hear from VW and what is your number so he can contact you ( or the regional manager) directly.

If the OBD communication failure *is* because of a ECU-related problem then VW is obligated to warranty it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Snyder, Jim  
**Sent:** Monday, July 21, 2014 2:12 PM  
**To:** 'Glas, Tobias'  
**Subject:** FW: 140517286

Hi Tobias, This guy **Ex. 6** is stuck between the dealer and the state inspection place . His car has OBD communication issues at the state I/M and with a generic scantool but the dealer says its okay and won't do anything unless he pays for a diagnosis first. He's talked

to several people and is getting anxious.

Thanks for looking into to it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Ball, Joel  
**Sent:** Thursday, July 17, 2014 3:54 PM  
**To:** Snyder, Jim  
**Subject:** FW: 140517286

Hi Jim,

Could you please contact VW. This individual's vehicle fails the state inspection in Illinois due to lack of communication with the testing equipment. However when he took the vehicle to the Volkswagen dealer they were able to communicate with their diagnostic equipment and found nothing wrong with the vehicle. He went back to the state inspection and failed again due to lack of communication. The state has told him that his vehicle is not working properly and needs to be fixed but VW won't fix it under warranty. Ex. 6

Joel Ball  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4238  
[ball.joel@epa.gov](mailto:ball.joel@epa.gov)

**From:**

**Ex. 6**

**Sent:** Tuesday, July 15, 2014 10:38 AM  
**To:** Ball, Joel  
**Subject:** Fwd: 140517286

Joel, I left you a voice mail earlier today. This is the issue mentioned. Please call me at your convenience at: **Ex. 6**

Thank you.

----- Forwarded message -----

From: **Ex. 6**  
Date: Tue, Jul 15, 2014 at 9:34 AM  
Subject: 140517286  
To: [vwcustomercare@vw.com](mailto:vwcustomercare@vw.com)

**Ex. 6**

Thank you for your time today talking about my challenging problem. I appreciate your listening and compassion. I've mostly enjoyed the VW Rabbit so this situation is rather traumatizing to me as I feel rather stuck between the EPA, the state testing (which I've learned is done differently in every state and

As you know, the EPA mandates emissions repairs on all vehicles less than 8 years old or 80,000 miles on it (please review <http://www.epa.gov/obd/pubs/420f09048.pdf>). Despite the highly friendly best efforts of Conrad at City Volkswagen as an initial courtesy, which I deeply appreciated, we have not gotten to the root cause of the issue and the problem is not yet solved.

The car has failed 3 times so far. Unfortunately, I do not currently feel any closer to resolving this issue than when I started. As I'm currently unemployed, I do not have available resources to fund an open ended diagnosis. Nor should I have to. No car built to the right quality standards should even be having this problem at less than 40,000 miles on any car.

I feel stuck in a black hole between the EPA, the State of IL emissions testing, the dealer and VW corporate. The bottom line is that the OBD can't be read but the emissions testing place lacks the power to mandate a certain manufacturer repair and there is no way for me to do any of the following:

1) Know I'm focused on the right problem

2) A clear path to a no cost or cost effective solution - there is one repair shop in the region that allegedly charges \$49 for a diagnosis and guarantees their repair work or your money back. The problem with that option is that as we discussed you won't accept their OBD determination.

I'd be forever appreciative if you could get upper VW management to fund the discovery that you suggest at City Volkswagen needs to do for us to proceed under the spirit of the warranty repair rather than the legalities of it. This action would restore my trust in a product I like overall and would likely make me a customer for life. Failure to fix it likely means I could never buy a VW in good faith again.

I look forward to your help in resolving this problem. Thank you.

**Ex. 6**

The content of this email is private unless otherwise noted.

\*\*\*Please excuse any typos from my mobile device\*\*\*

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 8/7/2014 8:06:37 PM  
**Subject:** RE: Verbal Golf Numbers from EPA

I didn't get the FE numbers I thought Vince did. He did say they were very good, within 1% of MFRs.

**From:** [Ex. 7]@vw.com]  
**Sent:** Thursday, August 07, 2014 3:27 PM  
**To:** Snyder, Jim; Schlueter, [Ex. 7]  
**Cc:** [Ex. 7]  
**Subject:** RE: Verbal Golf Numbers from EPA

Thanks Jim for the clarification and support.

After discussion with [Ex. 7] it was determine that no FE data was provided although there was a comment that the values were within tolerances of Mfr test (3%).

If available we would be interested in a look at FE.

Thanks

[Ex. 7]

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Thursday, August 07, 2014 3:22 PM  
**To:** [Ex. 7]  
**Cc:** [Ex. 7]  
**Subject:** RE: Verbal Golf Numbers from EPA



Correct, those are unadjusted but I did look at the DFs and DAFs to confirm passing values. I can't guarantee any official data by tomorrow. It depends if they hold it up waiting for the PM results.

-Jim

**From:** [Ex. 7]@vw.com  
**Sent:** Thursday, August 07, 2014 3:02 PM  
**To:** [Ex. 7] Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** Verbal Golf Numbers from EPA

Hello Jim: Thanks for the call with the information below. As we discussed if you can ask the lab staff to expedite results for Friday if possible, it would be greatly appreciated.

[Ex. 7]

I just got a call from Jim with (partial) verbal results listed below. I believe no DF or UAF has been applied to these numbers.

Also, Jim will be out of the office tomorrow so we should follow up with Vince.

FTP :

CO 0.1

NMOG 0.036

NOx 0.026

FE: No verbal given (provided already by Vince)

HFET :

NOx 0.0001

NMOG: No verbal given

FE: No verbal given (provided already by Vince)

**From:** [redacted] Ex. 7  
**Sent:** Thursday, August 07, 2014 7:48 AM  
**To:** [redacted] Ex. 7  
**Cc:** [redacted] Ex. 7  
**Subject:** RE: VW Golf: Shift schedule successfully loaded, but...

Just an update.

They now expect to start the FTP at 9 or so.

**From:** [redacted] Ex. 7  
**Sent:** Wednesday, August 06, 2014 4:18 PM  
**To:** [redacted] Ex. 7  
**Cc:** [redacted] Ex. 7  
**Subject:** FW: VW Golf: Shift schedule successfully loaded, but...

FYI

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]  
**Sent:** Wednesday, August 06, 2014 4:17 PM  
**To:** [redacted] Ex. 7  
**Subject:** RE: VW Golf: Shift schedule successfully loaded, but...

I talked to the lab and they were prepping the car at that time. Still on track to test Thursday.

**From:** [Ex. 7]@vw.com]

**Sent:** Wednesday, August 06, 2014 1:01 PM

**To:** Snyder, Jim

**Cc:** [Ex. 7]

**Subject:** RE: VW Golf: Shift schedule successfully loaded, but...

Hello Jim,

Thanks for the update.

I discussed the re-start procedure with [Ex. 7]. In the future we are working to have dyno mode more easily configured ahead of time in the software for more of our vehicles.

For the Golf, as a precaution please see steps 5 and 6 of the ESP deactivation procedure which are highlighted in yellow (page 3) of the attached document.

Please keep us advised of the test schedule. At this time [Ex. 7] are planning to be there Thursday morning.

Regards

Mike

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Tuesday, August 05, 2014 6:21 PM  
**To:** [REDACTED] Ex. 7  
**Cc:** [REDACTED] Ex. 7; Mazaitis, Vincent; Wehrly, Linc  
**Subject:** VW Golf: Shift schedule successfully loaded, but...

Well, as some of you may have heard, The lab was able to fix the problem and finally load the shift schedule near the end of the day. We watched it run during bag 2 and it looked fine. The Hwy would then run in the morning

Unfortunately after we left the cell, the driver was apparently too slow with the restart sequence (must do something within 5 seconds of key on? ) and the vehicle went into some ABS fault mode on the hot start. The test voided. I was tentatively told it may re-test Thursday but that bears discussion tomorrow morning.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Mon 8/4/2014 1:17:48 PM  
**Subject:** Golf Diesel test

Mike, I have caught up on all the emails regarding the Golf and I've talked to Vince. The lab has agreed to prep the car today using the standard shift schedule with the expectation that we will have this sorted out and can test with the correct schedule on Tuesday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**Cc:** Mazaitis, Vincent[mazaitis.vincent@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Tue 7/29/2014 9:39:15 PM  
**Subject:** Golf officially not running Wednesday.

From the lab:

“Unfortunately, we have not yet solved the shift schedule transfer issue on the VW, so we know the test cannot take place tomorrow (Wednesday). TSC will keep trying, but the worst case is that it requires Bill Courtois’ support”

-Jim

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 7/29/2014 6:47:48 PM  
**Subject:** VW Golf confirmatory test

Bill, Just heard from the lab that they are having some problems loading the shift schedule. If they don't sort it out soon we won't get the vehicle prepped today and the vehicle won't test Wednesday. , If I hear something definitive this afternoon I will let you know. Otherwise I recommend calling Vince first thing in the morning to see if it will test Wednesday. He gets in at 6:00 .

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Glas, Tobias[Tobias.Glas@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 7/29/2014 6:16:01 PM  
**Subject:** Ex. 6

Thanks.

**From:** Glas, Tobias [mailto:Tobias.Glas@vw.com]  
**Sent:** Tuesday, July 29, 2014 2:14 PM  
**To:** Snyder, Jim  
**Subject:** Ex. 6

Hi Jim!

I hope that helps !

Tobias

**From:** Wigman, Ian  
**Sent:** Tuesday, July 29, 2014 2:12 PM  
**To:** Glas, Tobias  
**Subject:** Ex. 6

Hey Tobias,

Here is the email we just sent to Ex. 6

\*\*\*\*\* E Ex. 6 \*\*\*\*\*



# Ex. 6

We will be covering the diagnosis charge only if you bring the vehicle into a VW dealer for diagnosis.

You would need to make an appointment with the dealer so that we can get a readout. We will then determine if we need a field representative to come and inspect the vehicle. If the repairs are deemed to be something that is not emissions related, we will not be assisting with any repairs.

If they are emissions components, the repairs could be covered under the emissions warranty. We will cover the diagnosis so that we can find out what is going on.

If you have any other questions, please feel free to contact me back.

Please let me know if you have any questions.

Thanks!

Ian Wigman

VWoA Customer CARE Center

VW Regional Case Manager

Volkswagen of America

3800 W. Hamlin Rd.

Auburn Hills, MI 48326

Phone 248 754-3213

[Ian.Wigman@vw.com](mailto:Ian.Wigman@vw.com)

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 7/28/2014 7:28:04 PM  
**Subject:** RE: EPA Scan Tool

Are you referring to the Certification confirmatory testing of new cars, or the in-use tests that Lynn Sohacki does?

The cert cars just get a quick code check by Ben Haynes. He uses a simple handheld scanner and that's it. I think it's an Autoxray brand but I can check.

Now the contractor that inspects the in-use cars has several higher level scan tools that they use for the in-use inspections. Tobias would know what they have better than me.

-Jim

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Monday, July 28, 2014 3:11 PM  
**To:** Snyder, Jim  
**Subject:** EPA Scan Tool

Hello Jim,

Can we get the make/model of the type of Scan tools EPA uses to check our cars out before testing? We talked with one of the gentlemen in the lab doing the drive trace last time we were at EPA, and he mentioned that usually they use a generic scan tool, but that he thought for our cars they might be using a laptop with some software on it. We talked to Vince afterwards and he said he didn't know of them using a laptop to do any readouts.

We are trying to get an idea of what EPA uses so we can mirror the readouts here before the vehicle gets delivered.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Rodgers, William (EEO)[[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Mon 7/28/2014 6:45:38 PM  
**Subject:** RE: VW Group - Lab Calculation Question

Bill, I've heard back from the lab and they agree with your assessment and are reprocessing the data. They looked further and so far only found it on the vw tests run 7/1 and 7/2 but are looking into it.

-Jim

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Thursday, July 17, 2014 3:19 PM  
**To:** Snyder, Jim  
**Subject:** RE: VW Group - Lab Calculation Question

Ok thanks and have a good weekend.

-Bill

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Thursday, July 17, 2014 3:18 PM  
**To:** Rodgers, William (EEO)  
**Cc:** Giles, Michael (EEO); Reineke, Dennis (EEO)  
**Subject:** RE: VW Group - Lab Calculation Question

Okay I'll Look at this and then I'll have to take it up with the lab. I am off tomorrow and am trying to complete some cert reviews today so this won't get my attention until next week.

-Jim

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Thursday, July 17, 2014 3:14 PM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Reineke, Dennis (EEO)  
**Subject:** RE: VW Group - Lab Calculation Question

Hi Jim,

The Verify data only includes the weighted IntTHC results derived from the Net Concentrations from each phase. I underlined the values in question in the attached lab print report that appear unadjusted for Ambient concentrations. The use of these numbers result in a weight IntTHC nearly 4-times higher than our results.

Regards,

Bill

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Thursday, July 17, 2014 1:52 PM  
**To:** Rodgers, William (EEO)  
**Cc:** Giles, Michael (EEO); Reineke, Dennis (EEO)  
**Subject:** RE: VW Group - Lab Calculation Question

I'll have to look into it. Do you know if this calculation is also done in Verify or is this upstream of Verify calculations. I ask because there are some calculations that Verify does independently and correctly that the lab does differently but aren't not used by Verify.

Jim

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Thursday, July 17, 2014 1:44 PM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Reineke, Dennis (EEO)  
**Subject:** VW Group - Lab Calculation Question

Hello Jim,

We have noticed what appears to be a discrepancy in recent THC calculations provided by your

lab. It appears for diesel concepts the lab is using Integrated THC without subtracting Ambient concentrations as referenced in the CFR40 86.144-94. For example test number 2014-0178-004 dated 7-2-2014, you will see that raw IntTHC was used for calculating the phase net concentrations, instead of an Ambient adjusted Net IntTHC.

Please let us know if which calculation procedure is correct.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Glas, Tobias[Tobias.Glas@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 7/28/2014 2:48:50 PM  
**Subject:** RE: Notification of a new in-use class T132

Tobias, any news about that customer with the car that won't communicate with the state's I/M? He sends me a note every day saying he hasn't been contacted by anyone.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Glas, Tobias [mailto:Tobias.Glas@vw.com]  
**Sent:** Monday, July 28, 2014 9:21 AM  
**To:** Sohacki, Lynn  
**Cc:** Snyder, Jim  
**Subject:** RE: Notification of a new in-use class T132

Hi Lynn !

Our mechanic and myself will be in Denver for the IUVP High altitude testing from August 4<sup>th</sup> to 16<sup>th</sup>.

Please schedule the Surveillance program around because we will not be able to check a car during that time.

Thank you



**Tobias Glas**

In-Use Emission Compliance Specialist

Engineering & Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone: (248) 754-4211

Cell: (248) 494-1537

Fax: (248) 754-4207

E-Mail: [Tobias.Glas@vw.com](mailto:Tobias.Glas@vw.com)

**From:** Sohacki, Lynn [<mailto:sohacki.lynn@epa.gov>]

**Sent:** Tuesday, July 15, 2014 4:55 PM

**To:** Glas, Tobias

**Subject:** Notification of a new in-use class T132

Hi, Tobias.

This is a notification of an upcoming in-use class. Normally, I send an email like this out when a notification letter is sent to a manufacturer to announce an in-use class. However, due to a support staff mix-up, the letter wasn't sent last month when I drafted it. It is being edited and will be sent tomorrow.

Unfortunately, the procurement process has proceeded independently of the letter and we have one of the vehicles scheduled to be procured next week.

I apologize for the late notice of both the in-use class and the notification of the procurement of this vehicle. I am attaching to this email a draft version of the notification letter. A final version will be mailed to Dennis and emailed to you. Because it has been so long, would you please confirm the mailing address?

The vehicle being brought in next week is:

<b>Ex. 6</b>	7/23/14 (Wednesday) 0730 Vehicle
Pick-up	

Please fill out the attached parameter sheet and return it to me.

Our contractor, **Ex. 4 - CBI** will be contacting you to schedule the maintenance. We have some flexibility in scheduling the maintenance of the vehicle. I hope that we can find something to accommodate your schedule. If not, please call me and I'll see what I can do.

Again, I apologize for the confusion. Please call me if you have any questions.

Thank you,

**Lynn Sohacki**

Compliance Division

Environmental Protection Agency

734-214-4851

734-214-4869 fax



**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Schrod, Thomas[schrodt.thomas@epa.gov]  
**Cc:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]; Giles, Michael (EEO)[michael.giles@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 7/23/2014 10:07:53 PM  
**Subject:** RE: EPA Dyno descriptions

Tom, can you answer this or forward it on?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Wednesday, July 23, 2014 11:21 AM  
**To:** Snyder, Jim  
**Cc:** Allen, Gregory (EEO); Giles, Michael (EEO)  
**Subject:** EPA Dyno descriptions

Hi Jim,

Can you provide or direct me to information regarding the dynos used at your lab?

We are looking for the following:

Dyno type            (front/4wheel)

Roller type          Single roll / twin roller

Dyno    id            name/number

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**From:** Snyder, Jim

**Required Attendees:**

**Ex. 7**

**Ex. 7**

**Location:** AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE

**Importance:** High

**Subject:** Canceled: VW Diesel DEF Refueling Strategy

**Start Date/Time:** Wed 7/16/2014 5:00:00 PM

**End Date/Time:** Wed 7/16/2014 6:00:00 PM

When: Wednesday, July 16, 2014 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

We already discussed the issues in this morning's mtg.

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Rodgers, William (EEO)[William.Rodgers@vw.com]; Yang, Ching-Shih[Yang.Ching-Shih@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Thur 7/10/2014 7:32:08 PM  
**Subject:** RE: Need shift schedules

Greg, Bill checked the revised files and while the initial errors are fixed, he found a couple more errors near the end. Apparently the checking software stops after a certain number of errors so it didn't see them.

Shift point 68 (@1792sec) and shift point 71 (@1868sec) are outside speed range. Bill suggested duplicating what you did at shift points 15 and 18 since they are repeats from bag 1.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Thursday, July 10, 2014 11:47 AM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Rodgers, William (EEO)  
**Subject:** RE: Need shift schedules

Hello Jim,

VGA Shift Schedules 0100 and 0101 have been corrected. Please let us know if they have any other issues with the datasets.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**From:** Giles, Michael (EEO)  
**Sent:** Wednesday, July 09, 2014 8:55 AM  
**To:** Allen, Gregory (EEO)  
**Subject:** FW: Need shift schedules

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Wednesday, July 09, 2014 8:50 AM  
**To:** Giles, Michael (EEO)  
**Subject:** FW: Need shift schedules

Mike, Bill ran the shift schedules through some checker on it found some time/speed points that are outside the speed trace tolerance. Look at the TXT files. IT shows which time points are outside tolerance. I think that has to get corrected before he can load them into their system.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)



**From:** Courtois, William  
**Sent:** Tuesday, July 08, 2014 9:23 AM  
**To:** Yang, Ching-Shih  
**Cc:** Haynes, Ben; Snyder, Jim  
**Subject:** RE: Need shift schedules

Folks,

VGA 100 and 101 have shift points with (time, speed) values that do not align with drive schedule (time, speed) values.

See the attached files,

Bill Courtois

**From:** Yang, Ching-Shih  
**Sent:** Monday, July 07, 2014 1:31 PM  
**To:** Courtois, William  
**Cc:** Haynes, Ben; Snyder, Jim  
**Subject:** RE: Need shift schedules

Attached are the XML shift schedule files.

Thanks, Ching-shih

**From:** Snyder, Jim  
**Sent:** Monday, July 07, 2014 1:30 PM  
**To:** Yang, Ching-Shih  
**Cc:** Haynes, Ben; Courtois, William  
**Subject:** RE: Need shift schedules

Ching-Shih, Bill, the shift schedules look okay to me. The first file is a single 18 hill LA4. It does not include the 3<sup>rd</sup> bag hot transient portion after re-start . The 2<sup>nd</sup> file covers a double Highway test (prep and test).

-Jim

**From:** Yang, Ching-Shih  
**Sent:** Monday, July 07, 2014 11:13 AM  
**To:** Snyder, Jim  
**Cc:** Haynes, Ben; Courtois, William  
**Subject:** RE: Need shift schedules

Jim,

The shift schedules are already in our system. I've attached the excel formats of the files for your review. Please let me know if and when it's good for me to send off to Bill.

Thanks, Ching-shih

**From:** Snyder, Jim  
**Sent:** Monday, July 07, 2014 11:01 AM  
**To:** Haynes, Ben; Yang, Ching-Shih  
**Cc:** Courtois, William; Spieth, John; Peralta, Maria  
**Subject:** RE: Need shift schedules

Please note that VW has encountered "logistical issues" with this vehicle. They are now saying it won't be available until after 28<sup>th</sup>. I also asked them if this is a new shift schedule or is it already in our system.

Jim Snyder

Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Haynes, Ben  
**Sent:** Monday, July 07, 2014 9:23 AM  
**To:** Snyder, Jim; Yang, Ching-Shih  
**Cc:** Courtois, William; Spieth, John; Peralta, Maria  
**Subject:** Need shift schedules

I have a test request for the following vehicle:

VGA - Volkswagen Group

VW370 40145 /15 – FTP 0100 and HWA 0101

This vehicle can be scheduled for testing the middle of next week 07/17/14 if the shift schedules can be put in place.

Thanks for your help in advance.

**Ben Haynes**

Technical Information Specialist

TATD/VTC

Supporting the USEPA through Cooperative Agreement

under the SEE Program

Scheduling Office

734-214-4261

S1 S 9 AGA 0101 HFET M-6 AVGA-0101  
S2 3 01 07:57:21 07/08/14 07:57:22 07/08/14  
S3 36.0 15.0 25.0 40.0 47.0 53.0  
S4 36.0 15.0 25.0 40.0 47.0 53.0  
S5  
S6  
S7 003 HWFE(Cert) HWFE(NoWarmup) HWFE(BI-Manual) HWFE(BI-Auto) <other>  
S8 2015  
SA 022 xxx SP 12 Bad mph. t= 1529.0 secs s= 36.0 mph is outside mph range.  
SA min= 28.97 mph, max= 29.63 mph  
SC STANDARD M-6 SHIFT SCHEDULE FOR HFET - No Downshifts - DECLUTCH FROM 6TH GEAR  
SP 1 0007.2 12 2  
SP 2 0011.6 23 3  
SP 3 0052.0 34 4  
SP 4 0072.0 45 5  
SP 5 0330.9 56 6  
SP 6 0747.0 60  
SP 7 0787.2 12 2  
SP 8 0791.6 23 3  
SP 9 0832.0 34 4  
SP 10 0852.0 45 5  
SP 11 1110.9 56 6  
SP 12 1529.0 60  
SEND

S1 S 9 AGA 0100 FTP M-6 NO DOWNSHIFTS AVGA-0100  
 S2 3 01 07:57:17 07/08/14 07:57:17 07/08/14  
 S3 17.0 15.0 25.0 40.0 47.0 53.0  
 S4 17.0 15.0 25.0 40.0 47.0 53.0  
 S5  
 S6  
 S7 002 FTP(Cert) LA4(PrepOnly) LA4 505 <other>  
 S8 2015  
 SA 022 xxx SP 3 Bad mph. t= 119.0 secs s= 17.0 mph is outside mph range.  
 SA min= 18.37 mph, max= 19.03 mph  
 SA 022 xxx SP 9 Bad mph. t= 311.0 secs s= 36.0 mph is outside mph range.  
 SA min= 36.85 mph, max= 37.15 mph  
 SA 022 xxx SP 12 Bad mph. t= 391.0 secs s= 17.0 mph is outside mph range.  
 SA min= 17.22 mph, max= 17.78 mph  
 SA 022 xxx SP 15 Bad mph. t= 423.0 secs s= 17.0 mph is outside mph range.  
 SA min= 18.07 mph, max= 18.73 mph  
 SA 022 xxx SP 18 Bad mph. t= 498.0 secs s= 17.0 mph is outside mph range.  
 SA min= 19.53 mph, max= 20.07 mph  
 SA 022 xxx SP 21 Bad mph. t= 546.0 secs s= 17.0 mph is outside mph range.  
 SA min= 19.47 mph, max= 20.13 mph  
 SA 022 xxx SP 24 Bad mph. t= 614.0 secs s= 17.0 mph is outside mph range.  
 SA min= 19.17 mph, max= 19.83 mph  
 SA 022 xxx SP 27 Bad mph. t= 672.0 secs s= 17.0 mph is outside mph range.  
 SA min= 18.21 mph, max= 18.79 mph  
 SA 022 xxx SP 32 Bad mph. t= 757.0 secs s= 17.0 mph is outside mph range.  
 SA min= 16.25 mph, max= 16.75 mph  
 SA 022 xxx SP 38 Bad mph. t= 1017.0 secs s= 17.0 mph is outside mph range.  
 SA min= 17.20 mph, max= 17.80 mph  
 SA 022 xxx SP 41 Bad mph. t= 1080.0 secs s= 17.0 mph is outside mph range.  
 SA min= 17.74 mph, max= 18.26 mph  
 SA 022 xxx SP 44 Bad mph. t= 1146.0 secs s= 17.0 mph is outside mph range.  
 SA min= 17.25 mph, max= 17.75 mph  
 SA 022 xxx SP 51 Bad mph. t= 1307.0 secs s= 17.0 mph is outside mph range.  
 SA min= 17.77 mph, max= 18.43 mph  
 SA 022 xxx SP 56 Bad mph. t= 1488.0 secs s= 17.0 mph is outside mph range.  
 SA min= 18.37 mph, max= 19.03 mph  
 SA 022 xxx SP 60 Bad mph. t= 1573.0 secs s= 47.0 mph is outside mph range.  
 SA min= 46.70 mph, max= 46.90 mph  
 SA 022 xxx SP 62 Bad mph. t= 1680.0 secs s= 36.0 mph is outside mph range.  
 SA min= 36.85 mph, max= 37.15 mph  
 SA 022 xxx SP 65 Bad mph. t= 1760.0 secs s= 17.0 mph is outSC STANDARD M-6 SHIFT  
 SCHEDULE FOR FTP - NO DOWNSHIFTS DECLUTCH FROM 6TH GEAR AT  
 SP 1 0025.3 12 2  
 SP 2 0063.0 23 3  
 SP 3 0119.0 30  
 SP 4 0167.6 12 2  
 SP 5 0171.5 23 3  
 SP 6 0198.6 34 4  
 SP 7 0204.3 45 5  
 SP 8 0224.8 56 6  
 SP 9 0311.0 60  
 SP 10 0351.3 12 2  
 SP 11 0355.9 23 3  
 SP 12 0391.0 30  
 SP 13 0406.8 12 2  
 SP 14 0410.0 23 3

SP 15 0423.0 30  
SP 16 0451.6 12 2  
SP 17 0454.6 23 3  
SP 18 0498.0 30  
SP 19 0519.5 12 2  
SP 20 0530.0 23 3  
SP 21 0546.0 30  
SP 22 0573.3 12 2  
SP 23 0608.0 23 3  
SP 24 0614.0 30  
SP 25 0651.8 12 2  
SP 26 0658.7 23 3  
SP 27 0672.0 30  
SP 28 0701.3 12 2  
SP 29 0720.0 20  
SP 30 0733.5 12 2  
SP 31 0739.5 23 3  
SP 32 0757.0 30  
SP 33 0770.8 12 2  
SP 34 0778.0 23 3  
SP 35 0951.0 30  
SP 36 0964.0 12 2  
SP 37 0971.3 23 3  
SP 38 1017.0 30  
SP 39 1057.4 12 2  
SP 40 1064.3 23 3  
SP 41 1080.0 30  
SP 42 1109.4 12 2  
SP 43 1122.0 23 3  
SP 44 1146.0 30  
SP 45 1173.0 12 2  
SP 46 1181.6 20  
SP 47 1209.7 12 2  
SP 48 1236.2 20  
SP 49 1270.4 12 2  
SP 50 1292.0 23 3  
SP 51 1307.0 30  
SP 52 1343.0 12 2  
SP 53 1361.4 20  
SP 54 1394.3 12 2  
SP 55 1432.0 23 3  
SP 56 1488.0 30  
SP 57 1536.6 12 2  
SP 58 1540.5 23 3  
SP 59 1567.6 34 4  
SP 60 1573.0 45 5  
SP 61 1593.8 56 6  
SP 62 1680.0 60  
SP 63 1720.3 12 2  
SP 64 1724.9 23 3  
SP 65 1760.0 30  
SP 66 1775.8 12 2  
SP 67 1779.0 23 3  
SP 68 1792.0 30  
SP 69 1820.6 12 2  
SP 70 1823.6 23 3

SP 71 1868.0 30  
SEND



N

0101

VGA

HFET M-6

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003

2015

STANDARD M-6 SHIFT SCHEDULE FOR HFET - No Downshifts - DECLUTCH FROM 6TH GEAR AT  
36 MPH

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12

2

11.6

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23

3

52

40

34

4

72

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7

787.2

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VGA

FTP M-6 NO DOWNSHIFTS

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2015

STANDARD M-6 SHIFT SCHEDULE FOR FTP - NO DOWNSHIFTS DECLUTCH FROM 6TH GEAR  
AT 36 MPH

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778

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1823.6

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71

1868

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20140702

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 7/8/2014 4:06:18 PM  
**Subject:** RE: VW PHEV Label Calculation and BEV Testing Meeting

[Ex. 7] That's fine. There is a conference phone in N66 that we can use.

Jim

**From:** [Ex. 7]@vw.com]  
**Sent:** Tuesday, July 08, 2014 10:58 AM  
**To:** Snyder, Jim  
**Subject:** VW PHEV Label Calculation and BEV Testing Meeting

Hello Jim:

I am looking forward to our meeting this Thursday. It looks like three people from VW will be in attendance at EPA. However, we have some folks that are either traveling or in Germany that would like to join by telephone. I have set up a call-in number for their use, as long as this is okay with you. Your meeting notice provides the location as AA-Room-Office-N66-ConfRoom/AA-OTAQ-OFFICE. It would be great if a telephone with a speaker feature is available.

Best regards,

[Ex. 7]

---

**Ex. 7**

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone:

Cell: (

E-Mail:

**Ex. 7**

**To:** [Ex. 7]  
**From:** Snyder, Jim  
**Sent:** Mon 7/7/2014 2:57:50 PM  
**Subject:** RE: VW Group - Golf 2.0L TDI Manual Supplemental Information

**Ex. 7** I will remind Ben not to schedule the testing for before then. Do you know if those are new shift schedules or have they been previously used by the lab? I have to follow up on them with the lab if they haven't been used in their system before.

Jim

**From:** [Ex. 7]@vw.com]

**Sent:** Thursday, July 03, 2014 10:12 AM

**To:** Snyder, Jim

**Cc:** [Ex. 7]

[Ex. 7]

**Subject:** VW Group - Golf 2.0L TDI Manual Supplemental Information

Hello Jim,

Today we sent the supplemental information for the Golf diesel with manual transmission which was selected for FTP / Hwy confirmatory testing.

Please note that due to logistical issues, the earliest availability date for this vehicle has changed to **July 28<sup>th</sup>**. We are letting you know since we are unable to correct the original date sent in the decision information data set.

Please advise with the actual test date when it is set.

Regards

[Ex. 7]

**Ex. 7**

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone:

Fax:

mailto:

**Ex. 7**

**To:** Rodgers, William (EEO)[[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Mon 6/30/2014 6:42:52 PM  
**Subject:** RE: VW Testing

I'll look into it.

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Monday, June 30, 2014 2:41 PM  
**To:** Snyder, Jim  
**Subject:** RE: VW Testing

No I was just about to start calling. Can you follow up?

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Monday, June 30, 2014 2:40 PM  
**To:** Rodgers, William (EEO)  
**Subject:** RE: VW Testing

Bill, Did Vince ever get back to you on this? I never caught him at his desk today.

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Monday, June 30, 2014 1:33 PM  
**To:** Mazaitis, Vincent  
**Cc:** Snyder, Jim  
**Subject:** VW Testing

Hello Vince,

While delivering four Volkswagen test vehicles at your facility this morning, we were informed by Ben that you would likely test one of the diesel models on Tuesday, instead of Wednesday as planned. Please confirm for us which vehicle will be tested and what time we should expect it to begin? We plan to have someone on hand to witness the tests.



Also please let us know when you intend to start testing on Wednesday and in what order the remaining vehicles will be tested.

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 6/30/2014 6:40:04 PM  
**Subject:** RE: VW Testing

Bill, Did Vince ever get back to you on this? I never caught him at his desk today.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Monday, June 30, 2014 1:33 PM  
**To:** Mazaitis, Vincent  
**Cc:** Snyder, Jim  
**Subject:** VW Testing

Hello Vince,

While delivering four Volkswagen test vehicles at your facility this morning, we were informed by Ben that you would likely test one of the diesel models on Tuesday, instead of Wednesday as planned. Please confirm for us which vehicle will be tested and what time we should expect it to begin? We plan to have someone on hand to witness the tests.

Also please let us know when you intend to start testing on Wednesday and in what order the remaining vehicles will be tested.

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Fri 6/27/2014 6:13:00 PM  
**Subject:** RE: PHEV Mtg

That's fine. I found a new room and rescheduled it.

**From:** [Ex. 7]@vw.com]  
**Sent:** Friday, June 27, 2014 1:53 PM  
**To:** Snyder, Jim  
**Subject:** FW: PHEV Mtg

Hello Jim,

Sorry for the second email but Thursday July 10<sup>th</sup> at 9 or 10 would work best for me. I will be out of the office Monday - Wednesday but if that works better for you go ahead and schedule for earlier in the week. It is more important for [Ex. 7] to meet with you.

Thanks,

[Ex. 7]

**From:** [Ex. 7]  
**Sent:** Friday, June 27, 2014 1:48 PM  
**To:** 'Snyder, Jim'  
**Subject:** RE: PHEV Mtg

Hello Jim,

I talked to [Ex. 7] and we agree it would be best to move the meeting to the following week. Any day should work but if possible we would like to schedule the meeting for the morning so some German colleagues can call in.

Thank you and best regards.

[Ex. 7]

**From:** Snyder, Jim [mailto:Snyder.Jim@epa.gov]

**Sent:** Friday, June 27, 2014 12:52 PM

**To:** [Ex. 7]

**Subject:** PHEV Mtg

[Ex. 7] I talked to Dave Good and showed him the questions. While he will be in next week but he thinks we're better off waiting for Rob French too. The spreadsheet is Rob's.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Snyder, Jim  
**Required Attendees:** Wehrly, Linc; Wright, DavidA; Ott, Franz; Dalton, Joel; French, Roberts; Ex. 7 Good, David  
**Optional Attendees:** Ex. 7 (EEO)  
**Location:** AA-Room-Office-N66-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** VW PHEV label calculation and BEV testing  
**Start Date/Time:** Thur 7/10/2014 1:30:00 PM  
**End Date/Time:** Thur 7/10/2014 2:30:00 PM  
2015 PHEV calculations Berechnungsvorlage 02.pptx

**When:** Thursday, July 10, 2014 9:30 AM-10:30 AM (GMT-05:00) Eastern Time (US & Canada).  
**Where:** AA-Room-Office-N66-ConfRoom/AA-OTAQ-OFFICE

**Note:** The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Fri 6/27/2014 4:51:32 PM  
**Subject:** PHEV Mtg

[Ex. 7] I talked to Dave Good and showed him the questions. While he will be in next week but he thinks we're better off waiting for Rob French too. The spreadsheet is Rob's.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

To: [Ex. 7]@vw.com]

Cc: [Ex. 7]@vw.com]; [Ex. 7]

**Ex. 7**

From: Snyder, Jim

Sent: Fri 6/27/2014 3:11:20 PM

Subject: RE: EPA EV Testing Lab Charger Install

Sure we can do that.

From: [Ex. 7]@vw.com]

Sent: Friday, June 27, 2014 11:03 AM

To: Snyder, Jim

Cc: [Ex. 7]

Subject: EPA EV Testing Lab Charger Install

Hi Jim,

I have been talking with Dan McBryde in the lab about installing EV chargers should our upcoming eGolf be tested in EPA. Dan is on vacation all next week, but he mentioned that we could stop into the lab charge monitoring area (by reception??) and take a look at the general set up. Would you mind walking us down there after our meeting on Tuesday afternoon? Should only take a few minutes.

Thanks

[Ex. 7]

**Ex. 7**





**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 6/26/2014 6:58:37 PM  
**Subject:** RE: e-Golf Testing

Hi [Ex. 7], I talked to Dan McBride about the current probe vs CAN address. It depended on the context. He said no if it's a PHEV but it occurred to me the eGolf is a BEV. On-board measurement isn't required on BEVs unless we are doing the Multi-cycle test procedure.

It turns out [Ex. 7] (?) has been communicating with Dan about connectors and hook ups. Since the VW charger is a wall charger without a plug, they will work something out for a connection.

**From:** [Ex. 7]@vw.com]  
**Sent:** Thursday, June 19, 2014 10:55 AM  
**To:** Snyder, Jim  
**Subject:** e-Golf Testing

Hello Jim:

Thanks for the discussion just now. You referenced page 10 of a handbook that includes NEMA codes for electrical connections. Perhaps we have seen this handbook and I just don't recall, but is this handbook something available to manufacturers?

Regards,

[Ex. 7]

---

**Ex. 7**

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone:

Cell: (

E-Mail:

**Ex. 7**

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 6/23/2014 8:52:18 PM  
**Subject:** RE: VW Group - Scheduling Request Update

Okay, I let the lab know but they hadn't officially scheduled it anyway.

-Jim

**From:** [Ex. 7]@vw.com]

**Sent:** Monday, June 23, 2014 3:42 PM

**To:** Snyder, Jim

**Cc:** [Ex. 7]

**Subject:** VW Group - Scheduling Request Update

Hello Jim,

As you may recall, earlier this spring we made a special request for scheduling consideration for confirmatory testing of the new e-Golf (BEV) . This request was for the time frame of July 7<sup>th</sup>.

Today we were informed that there have been internal delays with this vehicle. Therefore, we are now withdrawing our request. We will follow up when data finally becomes available for this vehicle.

As always, thank you for your consideration with scheduling and our apologies for any inconvenience this may have caused.

Regards

[Ex. 7]

**Ex. 7**

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone:

Fax:

mailto:

**Ex. 7**

**From:** Snyder, Jim

**Required Attendees:**

Ex. 7

Ex. 7

**Location:** AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE

**Importance:** Normal

**Subject:** VW Diesel DEF Refueling Strategy

**Start Date/Time:** Wed 7/16/2014 5:00:00 PM

**End Date/Time:** Wed 7/16/2014 6:00:00 PM

When: Wednesday, July 16, 2014 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

**From:** Snyder, Jim

**Required Attendees:** Wehrly, Linc; Wright, DavidA; Ott, Franz; Dalton, Joel; French,  
Roberts; [Ex. 7] [Ex. 7] @vw.com]

**Location:** AA-Room-Office-C34-ConfRoom/AA-OTAQ-OFFICE

**Importance:** Normal

**Subject:** VW PHEV label calculation and BEV testing

**Start Date/Time:** Tue 7/1/2014 5:00:00 PM

**End Date/Time:** Tue 7/1/2014 6:00:00 PM

2015 PHEV calculations\_Berechnungsvorlage\_02.pptx

When: Tuesday, July 01, 2014 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-C34-ConfRoom/AA-OTAQ-OFFICE

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Fri 6/13/2014 8:47:18 PM  
**Subject:** RE: Status update - 2.0L TDI Certification  
VW revised 2015 2.0L SCR AECD approval.pdf

See attachment. You can revise the application doc with it.

Jim

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Friday, June 13, 2014 8:48 AM  
**To:** Snyder, Jim  
**Subject:** Status update - 2.0L TDI Certification

Hello Jim,

Can you give me an update on the status of a condition certificate for the diesel test group FVGAV02.0VAL. We are drawing near the expected launch dates.

Thanks,

Bill

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Fri 6/13/2014 3:12:49 PM  
**Subject:** RE: VW PHEV presentation

Thanks for sending me the presentation. I have also forwarded it to others to review. Unfortunately next week is not a good time since I will be off-site most of the week. How about some time the week of the 23<sup>rd</sup>?

\_Jim

**From:** [Ex. 7]@vw.com]  
**Sent:** Wednesday, June 11, 2014 9:48 AM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** VW PHEV presentation

Good morning Jim,

[Ex. 7] is out of the office this week and wanted me to send this updated PHEV presentation from our folks in Germany.

They would like to have a meeting with you (and possibly Rob?) next week to explain the details.

Do you have an hour or so for us to come see you (and Germany to be on the phone) early in the week?

Thanks very much,

[Ex. 7]

**Ex. 7**



EEO-Auburn Hills MI

**Ex. 7**

---

Thank you,

**Ex. 7**

**To:** Thomas, Richard (EEO)[Richard.Thomas@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 6/5/2014 6:08:33 PM  
**Subject:** RE: 2015 Audi 2.0L FFV Test Group Fuel Economy Labels

Richard, I think I saw your number while I was on another call. I approved the Audis yesterday. I just saw Linc and reminded him that there's a bunch to sign.

**From:** Thomas, Richard (EEO) [mailto:Richard.Thomas@vw.com]  
**Sent:** Tuesday, June 03, 2014 1:36 PM  
**To:** Good, David  
**Cc:** Snyder, Jim  
**Subject:** 2015 Audi 2.0L FFV Test Group Fuel Economy Labels

Hi Dave;

I just completed five 2015 labels for the carry over 2.0L automatic quattro models, index numbers 064 through 068, into Verify. These models are on the ship to the US and we expect to have a rolling release of these models once they arrive here next week. Label indexes 064, 065 and 066, are carried over but of course the projected volumes are changed so that the sales weighted unrounded numbers are now slightly different. I would like to be sure that there are no rounding errors for these labels as I expect the values will go on Monroney labels next week.

We also have the 3.0L supercharged V6 gasoline models that will be arriving of the same ships. We just spoke to Jim who said he would put the Audi 3.0L V6 test group FVG AJ03.0AUD on the top of his list for issuance of the certificate. I cannot enter labels into Verify until we have a certificate issued. This test group contains nine model type labels that also have to be completed, with the exception of the Audi SQ5 where we have new data. All the other specific model type labels (eight) are carried over.

I don't know your schedule for the audit of labels, but could you let me know if you prefer to have all these new 2015 labels together or could you look at only the index 064-066 labels now?

If you have time you can give me a call to discuss.

Thanks,

Richard

Richard E. Thomas

Senior Emission Certification Specialist

Engineering & Environmental Office (EEO)

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4213

Fax: 248 754 4207

mailto: [Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 6/4/2014 4:29:13 PM  
**Subject:** Test Group FVGAJ03.0AUD

Bill, I finished reviewing the Audi certs. For the Test Group FVGAJ03.0AUD / Evaporative FVGAR0140AAD, on page 4 of the Appilcation pdf it shows the evap test vehicle as D3UF-Q5A / 1. It should be config 0 not 1. It appears to be correct everywhere else so I will approve the certificates now and you can revise the pdf

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 6/2/2014 1:42:03 PM  
**Subject:** RE: FVGAJ03.0AUD Open Cert Requests

Done.

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Monday, June 02, 2014 9:13 AM  
**To:** Snyder, Jim  
**Subject:** FVGAJ03.0AUD Open Cert Requests

Hello Jim,

Can you deny the other two open cert requests for the Testgroup: FVGAJ03.0AUD, Evap Families: FVGAR0140AAD and FVGAR0140NAF?

I'm having issues when trying to re-submit the data, Verify keeps saying that there are still locked CSI's referencing the tests in this testgroup. This way I'll re-run the tests, and resubmit the corrected data as a batch set.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 5/28/2014 4:40:39 PM  
**Subject:** RE: Test Reschedule

I heard back from the lab that it is now scheduled for 7/2/14.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Wednesday, May 28, 2014 11:15 AM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Allen, Gregory (EEO)  
**Subject:** Test Reschedule

Hi Jim,

We have not heard back regarding the possibility to reschedule the Passat TDI - VID: 361 50070/15 from June 11<sup>th</sup> to week 26 or 27. We would prefer week 26 (June 25<sup>th</sup>.) Please let us know if this can be arranged.

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 5/27/2014 8:13:51 PM  
**Subject:** RE: Cert Requests Rejected

Sorry, I started rejecting them and got pulled away right in the middle of it. Thanks for reminding me to finish the other two.

-Jim

**From:** Allen, Gregory (EEO) [mailto:Gregory.Allen@vw.com]  
**Sent:** Tuesday, May 27, 2014 3:02 PM  
**To:** Snyder, Jim  
**Subject:** Cert Requests Rejected

Hello Jim,

We received the rejected cert requests for testgroup FVGAJ03.0AUD, but the three e-mails we received were all for Evap Family: FVGAR0140AAD. There should have been three conditional requests uploaded for the EVAP families below that need to be rejected so we can make the revisions and re-submit.

Testgroup: FVGAJ03.0AUD

Evap Families: FVGAR0140AAD

FVGAR0140AAC

FVGAR0140NAF

They came through on the verify reports with the correct Evap families, so I'm not sure why these e-mails are all duplicated.

Feel free to give me a call to discuss if you have any questions.

Thanks Jim.

Regards,

Greg Allen

VWGoA EEO

(248)754-4209



**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 4/28/2014 9:41:40 PM  
**Subject:** RE: Request for Approval letters - 2015 2.0L TDI  
[VW 2015 2.0L SCR AECD approval.pdf](#)  
[VW 2015 DP Trap AF approval.pdf](#)

Approved.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [Ex. 7]@vw.com]  
**Sent:** Tuesday, March 18, 2014 3:34 PM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** Request for Approval letters - 2015 2.0L TDI

Hello Jim,

I want to bring to your attention two Request for Approval letters recently uploaded to Verify related to the upcoming and new I-4 2.0L TDI Diesel engine with SCR, planned for 2015 certification as test group FVGAV02.0VAL. The first letter is for approval of the SCR system and AECD's. The second letter is for approval of the PM Trap Regeneration adjust factors. I have attached copies of these letters for your convenience. Please contact myself or Len Kata if there any questions.

Regards,

[Ex. 7]

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

**Ex. 7**

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Certification Representative  
Compliance and Innovative Strategies Division  
U.S. Environmental Protection Agency  
2000 Traverwood  
Ann Arbor, Michigan 48105

Leonard W. Kata Name  
Manager Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
leonard.kata@vw.com E-Mail

Ms. Annette Hebert, Division Chief  
Emissions Compliance, Automotive Regulations and  
Science Division (ECAR)  
California Air Resources Board  
9528 Telstar Avenue  
El Monte, California 91731

March 14, 2014 Date

REVIEWED AND ACCEPTED

DATE 4/23/14 EPA REP JJS

APPROVED

Subject: Request for Approval - Volkswagen Group 2.0L TDI Diesel Particulate  
Trap Regeneration Adjustment Factors

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Dear Mr. Wehrly and Ms. Hebert:

The 2015 model year Volkswagen 2.0L TDI Diesel in Test Group FVGAV02.0VAL is equipped with an emissions control system that includes a particulate matter (PM) trap that is subject to periodic regeneration. Therefore, the Volkswagen Group is submitting a request for approval of the adjustment factors determination for both periodic regeneration events.

The demonstration of compliance with the applicable emission standards takes into account the effect on total missions resulting from both regeneration modes by applying the determined adjustment factors on the emission data vehicle test results.

If there are any questions regarding these materials, do not hesitate to contact me.

Sincerely,  
VOLKSWAGEN GROUP OF AMERICA, INC.



Leonard W. Kata  
Manager  
Emission Regulations and Certification

Enclosures

**Volkswagen Engineering Evaluation for Exhaust Emissions Adjustment Factors**

**2015 Model Year  
Volkswagen Passat, Golf, Jetta, Jetta Sportwagen,  
Beetle, Beetle Convertible and Audi A3,**

**2.0l TDI CR Diesel SCR**

**Test Group FVGAV02.0VAL**

**Full Useful Life of 150,000 Miles**

**Table of Content:**

Section	Topic	Page
1.	Certification Adjustment Factors	1-3

## 1. Certification Adjustment Factors (Engineering Evaluation and Determination of Adjustment Factors)

Volkswagen used the Durability Data Vehicle (DDV) which completed the Standard Road Cycle (SRC) over the full useful life distance of 120,000 miles extrapolated to 150,000 miles for determination of the regeneration intervals.

In the first step of the adjustment factor, determination the regeneration intervals were recorded during the SRC. The regeneration interval at the end of the road cycle (120,000 miles) was used for the factor determination representing the "worst case" concerning the interval length. The extrapolation to 150,000 miles is using the distances from zero to 120,000 miles.

According to the measurement and the extrapolation the regeneration intervals are as follows:

	Start of SRC (0 miles)	End of SRC (120 k miles)	End of SRC (150 k miles)
DPF-Trap (regeneration)	470 miles	366 miles	340 miles

### 1.1 PM-Trap Adjustment Factor

The regeneration event occurs at approximately 340-mile intervals (determined within the SRC). During the regeneration event, there is an emissions increase. Therefore, PM-Trap regeneration adjustment factors have been developed to reflect emission level changes at different loading rates of the PM-Trap and in those cases of PM-Trap regeneration. The factor will be applied to the emission results prior to comparison with the applicable standards.

To determine the appropriate adjustment factor, Volkswagen used the principles described in 40 CFR 86.004(l) for development of adjustment factors for heavy-duty engines. Calculation of the adjustment factor uses the following parameters:

$EF_H$  = Measured emissions from a test in which regeneration occurs

$EF_L$  = Measured emissions from a test in which regeneration does not occur

$F$  = Frequency of regeneration event (i.e., fraction of tests during which regeneration occurs)

$EF_A$  = Average Emission Rate; where,  $EF_A = (F)(EF_H) + (1 - F)(EF_L)$

$UAF$  = Upward Adjustment Factor; where,  $UAF = EF_A - EF_L$ . Applied to tests when no regeneration occurs.

$DAF$  = Downward Adjustment Factor; where,  $DAF = EF_A - EF_H$ . Applied to tests when regeneration occurs.

Test Cycles without Regeneration (Test Cycle = US75) = 31

		Emission Component (g/mi)				
		NMHC	CO	NO <sub>x</sub>	NMHC+NO <sub>x</sub>	PM
	F	0.033	0.033	0.033	0.033	0.033
Test cycle = FTP76	EF <sub>L</sub>	0.0114	0.1451	0.0340	0.0454	0.0005
Test cycle = FTP 76	EF <sub>H</sub>	0.0247	0.1752	0.1137	0.1384	0.0087
	EF <sub>A</sub>	0.0120	0.146	0.037	0.048	0.001
	UAF	0.0004	0.0010	0.0026	0.0030	0.0003
	DAF	-0.0129	-0.0291	-0.0771	-0.0900	-0.0079

All adjustment factors for PM-Trap regeneration are additive.

### Total Vehicle Emissions

The test results of an emission data vehicle (EDV) are adjusted with the regeneration adjustment factors and the additive deterioration factors. The DF's will be calculated as usual and entered into EPA's database.

Volkswagen will apply the applicable adjustment factors as determined within this submittal during the next steps of certification work, specifically when entering durability data and emission certification data after partial approval of this adjustment factor determination for the periodic regeneration modes.

### Conclusion

Based on this engineering evaluation the adjustment factor determination covers the emission aspect and the change in regeneration frequency over the full useful life.

Therefore, Volkswagen requests final approval of the PM-Trap regeneration adjustment factors.

**To:** Giles, Michael (EEO)[[michael.giles@vw.com](mailto:michael.giles@vw.com)]  
**Cc:** Rodgers, William (EEO)[[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Fri 4/18/2014 8:13:31 PM  
**Subject:** Test Group: FVGAT03.6VUK

Guys, While reviewing the Part One application for this test group I found that the OBD section is wrong. The OBD approval letter and the description section from page 45 to 177 are for a 6.0L Bentley test group not the 3.6 Tiquan. Let me know when it has been revised and I will complete my review of the Request for Certificate.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Mazaitis, Vincent[mazaitis.vincent@epa.gov]  
**Cc:** Giles, Michael (EEO)[michael.giles@vw.com]; Allen, Gregory (EEO)[Gregory.Allen@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 4/15/2014 7:59:57 PM  
**Subject:** RE: FAUE-DAQ

Yes that is correct. Sorry I thought you were already aware of that miscue . The vehicle confirmed emissions and fuel economy and has completed testing.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Tuesday, April 15, 2014 3:30 PM  
**To:** Mazaitis, Vincent; Snyder, Jim  
**Cc:** Giles, Michael (EEO); Allen, Gregory (EEO)  
**Subject:** RE: FAUE-DAQ

Hello Jim and Vince,

Although minor, we've noticed upon further review of the lab results from the recent Audi A8 tests that the percentage difference of 7.73% noted on the FTP result was erroneous due to the comparison being made to the Manufacturer test performed while in Start/Stop Active mode.

The true difference between the Deactivated mode FTP tests was 2%.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219



[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Mazaitis, Vincent [<mailto:mazaitis.vincent@epa.gov>]  
**Sent:** Friday, April 11, 2014 7:04 AM  
**To:** Giles, Michael (EEO); Rodgers, William (EEO)  
**Cc:** Snyder, Jim  
**Subject:** FAUE-DAQ

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thank You,

Vincent Mazaitis

(734)214-4864

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 4/14/2014 7:28:12 PM  
**Subject:** FW: Road speed fan  
Final POC RS fan overview.pdf

Here is the info on the fan. Sorry for the delay, apparently his PC's web access was down last week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

# TATD LD portable Road Speed Fan quick specifications

## -Contractor:

Prime One Contracting

## -Flow area:

31.5" wide x 24" tall

## -Required flow velocity range:

0 to 80 mph

## -Floor to bottom of duct:

4" to 20" electronically adjustable

## -Unit width

≈ 84"

## -Unit length

≈ 92"

## -Unit height for transport

≈ 65"

## -Unit ground clearance

≈ 6"

## -Approximate weight

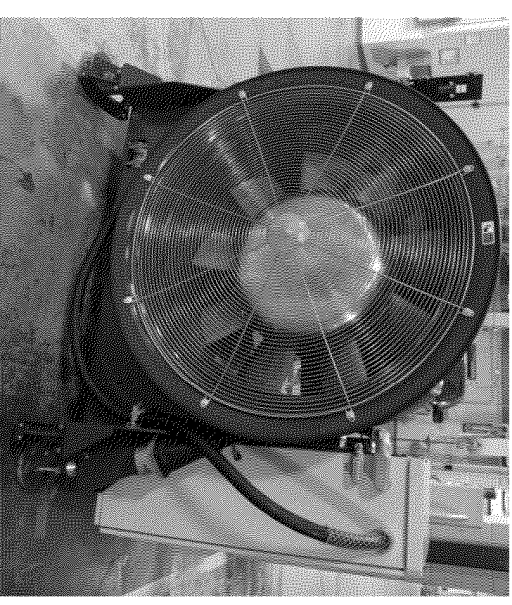
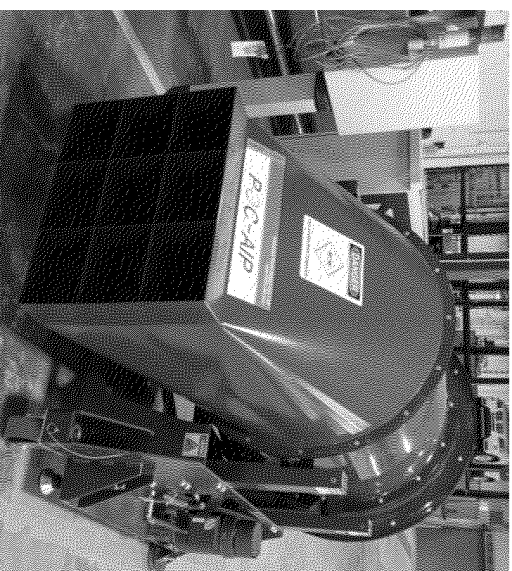
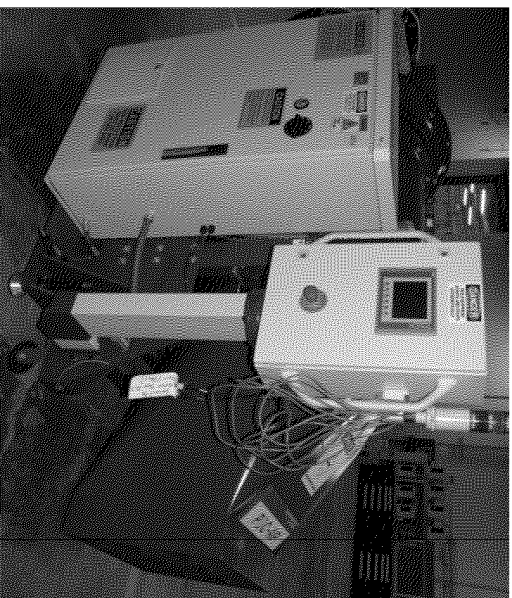
3800 lbs

## -Restraint system

Four restraint "feet",

-Meets flow delivery and uniformity requirements of 1066

-EPA added fixtures to allow the unit to be transported with a vehicle mover, also serve as restraints



**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Mon 4/14/2014 12:19:46 PM  
**Subject:** RE: Fan photos

Yes, I contacted the engineer responsible for it but I haven't heard back yet.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Monday, April 14, 2014 8:08 AM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO)  
**Subject:** Fan photos

Hi Jim,

Just a reminder that you were going to send me a photo of your new US06 fan.

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** [Ex. 7]@vw.com]  
**From:** Snyder, Jim  
**Sent:** Fri 3/21/2014 5:12:49 PM  
**Subject:** RE: Off-Cycle Credits

[Ex. 7] Sorry I was out sick a couple days. I scheduled a room for 1:00 on Monday. Can you arrange a conference call #?

Jim

**From:** [Ex. 7]@vw.com]  
**Sent:** Thursday, March 20, 2014 1:48 PM  
**To:** Snyder, Jim  
**Subject:** RE: Off-Cycle Credits  
**Importance:** High

Hello Jim:

Have you had any success setting up this meeting? Once again, tomorrow afternoon would work for us. Preferably early afternoon. It should take less than one hour. Monday after 11:00 a.m. would be our next chance.

Best regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: **Ex. 7**

Cell: **Ex. 7**

E-Mail: **Ex. 7**

**From:** **Ex. 7**  
**Sent:** Wednesday, March 19, 2014 8:49 AM  
**To:** 'Snyder, Jim'  
**Subject:** RE: Off-Cycle Credits  
**Importance:** High

Hello Jim:

Our Friday morning is booked, but anytime Friday after 12:30 p.m. would work.

Regards,

**Ex. 7**

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Tuesday, March 18, 2014 5:45 PM  
**To:** **Ex. 7**  
**Subject:** RE: Off-Cycle Credits

**Ex. 7** Linc won't be in this Thursday. We could do something Friday , Monday or Next Thursday afternoon. The rest of next week is actually pretty crowded.

Jim

**From:** [Ex. 7]@vw.com  
**Sent:** Monday, March 17, 2014 11:11 AM  
**To:** Snyder, Jim  
**Cc:** [Ex. 7]  
**Subject:** RE: Off-Cycle Credits  
**Importance:** High

Hello Jim:

I would like to try again to schedule a VW/EPA conference call to have a preliminary discussion regarding off-cycle GHG credits. If possible, we would like to do this within the next few days. I have meetings tomorrow and Wednesday mornings at 0900-1030. Do you have an opening in your schedule that would work?

Best regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: [Ex. 7]

Cell: [Ex. 7]

E-Mail [Ex. 7]

---

**From:** Ex. 7  
**Sent:** Monday, March 10, 2014 3:00 PM  
**To:** 'Snyder, Jim'  
**Cc:** Ex. 7 (@vw.com)  
**Subject:** RE: Off-Cycle Credits

Hello Jim:

Thanks for the response. Unfortunately, Thursday morning (03/13/14) doesn't work for us. Since this call does not involve our German colleagues, afternoons are okay. Would a call on Wednesday (03/12/14) after 3:00 p.m. or Thursday (03/13/14) after 2:00 p.m. work?

Best regards,

**Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.



Pho  
Cell  
E-M

**Ex. 7**

-----Original Appointment-----

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]

**Sent:** Friday, March 07, 2014 4:01 PM

**To:** **Ex. 7**

**Subject:** New Time Proposed: Off-Cycle Credits

**When:** Tuesday, March 11, 2014 10:00 AM-11:00 AM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Online Meeting

**Ex. 7** We already have mtgs from 10 to 12 on Tuesday. Wed morning too but Thursday morning is open. Afternoons are available too if its just us but I assume there may be German call-ins?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

-----  
New Meeting Time Proposed:

Thursday, March 13, 2014 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).

**From:** Snyder, Jim

**Required Attendees:** Wehrly, Linc; French, Roberts; Wright, DavidA; Dalton, Joel;

**Ex. 6**

**Location:** AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE

**Importance:** Normal

**Subject:** VW phone conference: discuss off-cycle GHG credits

**Start Date/Time:** Mon 3/31/2014 5:00:00 PM

**End Date/Time:** Mon 3/31/2014 6:00:00 PM

When: Monday, March 31, 2014 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

Hello Jim:

I would like to try again to schedule a VW/EPA conference call to have a preliminary discussion regarding off-cycle GHG credits.

Best regards,

**Ex. 6**

**To:** [Ex. 7]@vw.com]

**Cc:** [Ex. 7]

[Ex. 7]

**From:** Snyder, Jim

**Sent:** Tue 3/18/2014 8:15:36 PM

**Subject:** RE: Request for Approval letters - 2015 2.0L TDI

Thanks for the heads up.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [Ex. 7]@vw.com]

**Sent:** Tuesday, March 18, 2014 3:34 PM

**To:** Snyder, Jim

**Cc:** [Ex. 7]

**Subject:** Request for Approval letters - 2015 2.0L TDI

Hello Jim,

I want to bring to your attention two Request for Approval letters recently uploaded to Verify related to the upcoming and new I-4 2.0L TDI Diesel engine with SCR, planned for 2015 certification as test group FVGAV02.0VAL. The first letter is for approval of the SCR system and AECD's. The second letter is for approval of the PM Trap Regeneration adjust factors. I have attached copies of these letters for your convenience. Please contact myself or Len Kata if there any questions.

Regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

**Ex. 7**

**From:** Snyder, Jim  
**Location:** Online Meeting  
**Importance:** Normal  
**Subject:** New Time Proposed: Off-Cycle Credits  
**Start Date/Time:** Tue 3/11/2014 2:00:00 PM  
**End Date/Time:** Tue 3/11/2014 3:00:00 PM

**Ex. 7** We already have mtgs from 10 to 12 on Tuesday. Wed morning too but Thursday morning is open. Afternoons are available too if its just us but I assume there may be German call-ins?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

-----  
New Meeting Time Proposed:  
Thursday, March 13, 2014 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 2/27/2014 9:48:07 PM  
**Subject:** RE: Decision information

I waived them but I still want to test the 3.0L with dual injection.

FYI, I will be out of the office next week from this Friday to next Thursday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Thursday, February 27, 2014 1:19 PM  
**To:** Snyder, Jim  
**Cc:** Allen, Gregory; Giles, Michael (EEO)  
**Subject:** Decision information

Hello Jim,

I wanted to let you know that I submitted two decision information files yesterday regarding the 2015 Lamborghini Gallardo replacement called the Huracan and Huracan Spyder. Please let us know if you plan to confirm these models.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**Cc:** Stump, Barbara[Stump.Barbara@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Thur 2/20/2014 8:26:42 PM  
**Subject:** cert fees not paid yet

Bill, I approved one certificate but the fees haven't been logged in for the other two. If this is a rush we can give Barbara a heads up, otherwise I'm guessing they will probably appear by Monday.



Motor

For Certification

 Manufacturer Name VOLKSWAGEN

 Address 3800 Ha

 City/State/Zip Code/Country Au

On-Highway

☒ LDV/LDT/MDPV/HDV (Chassis ce:

☐ LDV/LDT/MDPV/HDV (Chassis ce:

☐ HDE (Engine Dyno cert) FEDER

EPA standard family or test group:

Amount paid (U.S. Funds Only):

Enter the check number, or the state

Reduc

 Reduced fee calculation (minimum ini  
 Aggregate retail sales price of the  
 Check box if an Independent Commerci

☐

☐





U.S.  
Motor Vehicle

For Certification

Manufacturer Name VOLKSWAGEN Group

Address 3800 Hamlin

City/State/Zip Code/Country Auburn

On-Highway Certification

- ☒ LDV/LDT/MDPV/HDV (Chassis cert)  
☐ LDV/LDT/MDPV/HDV (Chassis cert)  
☐ HDE (Engine Dyno cert) FEDERAL

EPA standard family or test group:

Amount paid (U.S. Funds Only):

Enter the check number, or the statement

Reduced

Reduced fee calculation (minimum initial  
 Aggregate retail sales price of the vehicle)  
 Check box if an Independent Commercial

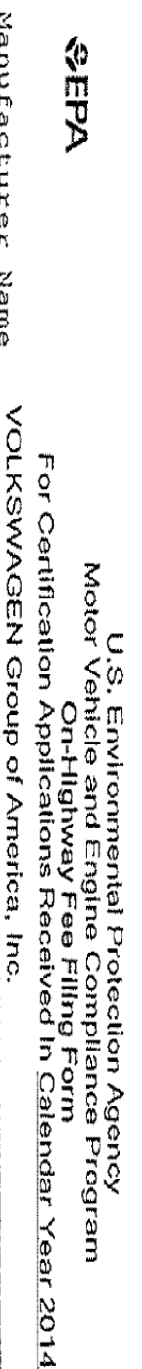
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Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)



Manufacturer Name VOLKSWAGEN Group of America, Inc.  
 Address 3800 Hamlin Road  
 City/State/Zip Code/Country Auburn Hills, MI 48326

## On-Highway Certification Request Type (check one)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Lbv/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$28,528) | <input type="checkbox"/> HDV EVAP-ONLY (\$563)      |
| <input type="checkbox"/> Lbv/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$15,077)           | <input type="checkbox"/> HDE CALIF-ONLY (\$563)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$38,464)                     | <input type="checkbox"/> MOTORCYCLE (\$1,717)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$88,591) |

EPA standard family or test group:

F	V	G	A	T	0	3	.	0	N	U	3
---	---	---	---	---	---	---	---	---	---	---	---

Amount paid (U.S. Funds Only) ::

**\$ 28,528.00**

Enter the check number, or the statement "WIRE" or "ACH":

EFT

Reduced Fee Section (40 CFR 51027.120)

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/units covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/units: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:

Company Representative: **Richard E. Thomas**

Signature:

Title: **Emission Cert Strategist** Phone/Fax: **248 754 4213** / **248 754 4207** Date: **02 / 12 / 2014**

E-mail Address: Richard.Thomas@VW.com

(1) Online: Forms may be found and submitted with or without payments online at [www.Pay.gov](http://www.Pay.gov).  
(2) By mail: For check payments only, send checks and this form to:

Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program

St. Louis, MO 63197-9000

- (3) Transmit offline Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2)  
(4) Transmit offline ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2)  
(5) Forms not submitted under (1) and (2) above can be sent as email attachments to fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

# Ex 9



**U.S. Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program**

**On-Highway Fee Filing Form**  
For Certification Applications Received in Calendar Year 2014

**VOLKSWAGEN Group of America, Inc.**

Manufacturer Name

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48326

**On-Highway Certification Request Type (check one)**

☒ LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$28,528) ☐ HDV EVAP-ONLY (\$563)

☐ LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$15,077) ☐ HDV CALIF-ONLY (\$563)

☐ HDV (Engine Dyno cert) FEDERAL (\$38,464) ☐ MOTORCYCLE (\$1,717)

☐ LD/MDPV/HDV ICI (\$88,591)

EPA standard family or test group:

F V G A T 0 3 . 0 N U 2

Amount paid (U.S. Funds Only):

\$28,528.00

Enter the check number, or the statement "WIRE" or "ACH":

EFT

**Reduced Fee Section (40 CFR \$1027.120)**

Aggregate retail sales price of the vehicles/units: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


Company Representative: Richard E. Thomas

Signature:

Title: Emission Cert Strategist Phone/Fax: 248 764 4213 / 248 764 4207 Date: 02 / 12 / 2014

E-mail Address: Richard.Thomas@VW.com

Submission of payments and forms:

(1) Online: Forms may be found and submitted with or without payments online at [www.pay.gov](http://www.pay.gov).

(2) By mail: For check payments only, send checks and this form to:

**Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program**  
P.O. Box 979032  
St. Louis, MO 63197-9000

(3) Transmit offline wire payments to the New York Federal Reserve Bank. (See Instructions, p.2)

(4) Transmit offline ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2)

(5) Forms not submitted under (1) and (2) above can be sent as email attachments to [fees@epa.gov](mailto:fees@epa.gov). Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

**EX. 6**

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 2/20/2014 8:09:31 PM  
**Subject:** 2015 SCR AECD Approval  
2015 SCR AECD Approval CBI\_FVGA\_COMMON\_RFA\_SCR\_R01.pdf

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)



**To:** Rodgers, William (EEO)[[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)]  
**From:** Snyder, Jim  
**Sent:** Wed 2/19/2014 11:20:02 PM  
**Subject:** RE: VW Group Certification Priorities

Okay I looked some more and found the AECD descriptions are indeed in all 3 Part 1 applications. Still probably good to correct the incomplete AECD description in the Common document. Right now our printer network is down so I can't send you an approved copy anyway. I'll find a personal printer tomorrow if not resolved.

**From:** Snyder, Jim  
**Sent:** Wednesday, February 19, 2014 4:58 PM  
**To:** 'Rodgers, William (EEO)'  
**Subject:** RE: VW Group Certification Priorities

Bill, I left you a voice mail regarding the SCR/AECD document, 2015\_CBI\_FVGA\_COMMON\_RFA\_SCR, missing most of the AECD attachment, but I also just noticed the first page lists NU2 twice on the cover page instead of NU3. Can you get that corrected too?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [<mailto:William.Rodgers@vw.com>]  
**Sent:** Monday, February 17, 2014 3:23 PM  
**To:** Snyder, Jim  
**Cc:** Allen, Gregory; Giles, Michael (EEO)  
**Subject:** VW Group Certification Priorities

Hello Jim,

Over the last weeks two we have uploaded several 2015 model year Initial Applications/Certification Requests and an SCR/AECD approval request letter for review. For purposes of prioritization I've provided the following workflows in order of priority depending on start of production and launch importance:

1) Pending submitted;	2015_CBI_FVGA_COMMON_RFA_SCR Related to the following 3.0L diesel test groups	Feb 17, 2014
2) Pending submitted;	2015_CBI_FVGAJ03.0NU4_APP_INI_ Start of production May 17, 2014	Feb 13, 2014
3) Pending submitted;	2015_CBI_FVGAV04.0NUA_APP_INI_ Start of production May 17, 2014	Feb 6, 2014
4) Pending submitted;	2015_CBI_FVGAT03.0NU3_APP_INI_ Start of production May 17, 2014	Feb 17, 2014
5) Pending submitted;	2015_CBI_FVGAT03.0NU2_APP_INI_ Start of production May 26, 2014	Feb 17, 2014

There are many more applications to come related to the normal start of production dates of May 26, 2014. Please let me know if there are any questions.

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 2/11/2014 1:31:06 PM  
**Subject:** FW: VW driver trace request.  
[D220140038006testsae.xls](#)  
[D220140038005testsae.xls](#)  
[D220140038004testsae.xls](#)

**From:** Courtois, William  
**Sent:** Monday, February 10, 2014 2:57 PM  
**To:** Snyder, Jim  
**Subject:** RE: VW driver trace request.

Jim,

Three files are attached.

The file format has been changed to the SAE J 2951 format. We can send the old format files if preferred.

Let me know if there are any concerns regarding these files.

Bill Courtois

**From:** Snyder, Jim  
**Sent:** Monday, February 10, 2014 12:28 PM  
**To:** Courtois, William  
**Subject:** VW driver trace request.

Hi Bill, VW has requested the driver's trace for the test's on their Audi A3, vehicle# FAPA-AAF. I will request that they submit their trace to us also.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]; Mazaitis, Vincent[mazaitis.vincent@epa.gov]  
**From:** Snyder, Jim  
**Sent:** Thur 1/30/2014 5:20:24 PM  
**Subject:** RE: FAPA-AAF

Bill, I will be offsite Friday so CC Vince on the note in case a re-test request needs to be submitted.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Thursday, January 30, 2014 11:11 AM  
**To:** Mazaitis, Vincent  
**Cc:** Snyder, Jim  
**Subject:** RE: FAPA-AAF

Thanks.

@Jim we will let you know regarding any retests tomorrow.

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Mazaitis, Vincent [<mailto:mazaitis.vincent@epa.gov>]

**Sent:** Thursday, January 30, 2014 10:07 AM

**To:** Rodgers, William (EEO)

**Cc:** Snyder, Jim

**Subject:** FAPA-AAF

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thank You,

Vincent Mazaitis

(734)214-4864

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 1/28/2014 1:57:14 PM  
**Subject:** RE: Tire size on Audi FAPA-AAF

This vehicle does not have Start/Stop, correct?

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Tuesday, January 28, 2014 7:20 AM  
**To:** Snyder, Jim; Giles, Michael (EEO)  
**Subject:** RE: Tire size on Audi FAPA-AAF

Hi Jim,

The tire size on the car is correct and reflects the tire listed in the application. I have corrected the Supplemental Information where the error was found.

I have called and left a message with Ben Haynes also knowing he is in the office early.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Monday, January 27, 2014 5:37 PM  
**To:** Giles, Michael (EEO); Rodgers, William (EEO)  
**Subject:** FW: Tire size on Audi FAPA-AAF

Mike, Bill, does it have the correct tires and the data is wrong , or vice-versa?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Haynes, Ben  
**Sent:** Monday, January 27, 2014 4:22 PM  
**To:** Snyder, Jim  
**Cc:** Spieth, John  
**Subject:** Tire size on Audi FAPA-AAF

Verify shown drive tire as 215/55R17 but what was on the vehicle was 225/45R17.

**Ben Haynes**

Technical Information Specialist

TATD/VTC

Supporting the USEPA through Cooperative Agreement

under the SEE Program



Scheduling Office

734-214-4261

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Tue 1/28/2014 1:51:57 PM  
**Subject:** RE: Tire size on Audi FAPA-AAF

Thanks for clearing that up.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Tuesday, January 28, 2014 7:20 AM  
**To:** Snyder, Jim; Giles, Michael (EEO)  
**Subject:** RE: Tire size on Audi FAPA-AAF

Hi Jim,

The tire size on the car is correct and reflects the tire listed in the application. I have corrected the Supplemental Information where the error was found.

I have called and left a message with Ben Haynes also knowing he is in the office early.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Monday, January 27, 2014 5:37 PM  
**To:** Giles, Michael (EEO); Rodgers, William (EEO)  
**Subject:** FW: Tire size on Audi FAPA-AAF

Mike, Bill, does it have the correct tires and the data is wrong , or vice-versa?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Haynes, Ben  
**Sent:** Monday, January 27, 2014 4:22 PM  
**To:** Snyder, Jim  
**Cc:** Spieth, John  
**Subject:** Tire size on Audi FAPA-AAF

Verify shown drive tire as 215/55R17 but what was on the vehicle was 225/45R17.

**Ben Haynes**

Technical Information Specialist

TATD/VTC

Supporting the USEPA through Cooperative Agreement

under the SEE Program

Scheduling Office

734-214-4261

**To:** Kata, Leonard (EEO)[Leonard.Kata@vw.com]  
**Cc:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Wed 1/22/2014 10:46:18 PM  
**Subject:** RE: **Ex. 4 - CBI**

Well Len after our discussion today, I went back and confirmed **Ex. 4 - CBI**

**Ex. 4 - CBI** My interpretation of 86.1807-01 was that 86.1807-01 (a)(3)(vi) requires “exhaust emissions standards” or “...in lieu of this requirement, manufacturers may use the standardized test group name designated by EPA.” I took “standardized test group name” to mean “Tier2BinX” but that may be interpreted differently.

Regardless, page 2 of Guidance CISD-06-19 (attached) says

“...Although the changes to §86.1807-01 do not require explicit display of standards, e.g. identifying a light-duty truck as a Tier 2 Bin 5 LDT3, EPA encourages manufacturers to display

such information on the label.” And Example 10 shows just “Tier 2” without a Bin #.

So **Ex. 4 - CBI** are allowed but EPA *encourages* more detail.

**From:** Kata, Leonard (EEO) [mailto:Leonard.Kata@vw.com]  
**Sent:** Tuesday, January 21, 2014 9:15 AM  
**To:** Snyder, Jim  
**Cc:** Rodgers, William (EEO)  
**Subject:** **Ex. 4 - CBI**  
**Importance:** High

Hello Jim:

**Ex. 4 - CBI**

## **Ex. 4 - CBI**

WE need to get an early “okay” so that labels are available from our supplier in time for production.

# **Ex. 4 - CBI**

Best regards,

Len

---

**Leonard W. Kata**

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

Audi LOGO	<b>AUDI AG</b> <b>VEHICLE EMISSION CONTROL INFORMATION</b>		
Conforms to regulations:			2015 MY
U.S. EPA:	Tier 2 LDV	OBD: CA II	Fuel: Diesel
California:	ULEV125 PC	OBD: CA II	Fuel: Diesel
No adjustments needed.	DF/ITC/CAC/WR-HO2S/ <b>OC/DPF+SCRC/SCRC/EGR/EGRC/NOXS</b>		
Group: FVGAV02.0VAL Evap: N/A	8V0 010 504 ??		



**To:** Johnson, Stuart (EEO)[Stuart.Johnson@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 1/16/2014 9:26:56 PM  
**Subject:** Fuel Cell testing

Stuart , I talked to Jenny today and scheduled a mtg. FYI, I'm told SAE J2572 is the recommended doc for testing procedure.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Snyder, Jim  
**Required Attendees:** Paulina, Carl; Johnson, Stuart (EEO) [Stuart.Johnson@vw.com];  
Wright, DavidA; jenny.sigelko@vw.com  
**Optional Attendees:** Dalton, Joel; Ball, Joel; Wehrly, Linc; Ott, William; Anderson,  
Tom  
**Location:** AA-Room-Office-N66-ConfRoom/AA-OTAQ-OFFICE  
**Importance:** Normal  
**Subject:** VW: Fuel Cell certification and Testing  
**Start Date/Time:** Wed 1/22/2014 6:00:00 PM  
**End Date/Time:** Wed 1/22/2014 7:00:00 PM

When: Wednesday, January 22, 2014 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-N66-ConfRoom/AA-OTAQ-OFFICE

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

This mtg is for VW to give a very short overview of a future Fuel cell vehicle, and then ask questions about how to certify and test it.

I invited several of you to optionally attend.

**To:** Rodgers, William (EEO)[William.Rodgers@vw.com]  
**From:** Snyder, Jim  
**Sent:** Thur 1/9/2014 6:24:23 PM  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

Thanks Bill, I forwarded it on. Please also find out if those coefficients for the regular Jetta are correct in that table.

**From:** Rodgers, William (EEO) [mailto:William.Rodgers@vw.com]  
**Sent:** Thursday, January 09, 2014 1:03 PM  
**To:** Snyder, Jim  
**Cc:** Giles, Michael (EEO); Allen, Gregory  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

Hi Jim,

Attached is the Jetta Hybrid ESP deactivation procedure requested.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Rodgers, William (EEO)  
**Sent:** Thursday, January 09, 2014 12:38 PM  
**To:** 'Snyder, Jim'  
**Cc:** Giles, Michael; Allen, Gregory  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

Hello Jim,

The Common application is clearly a typo. I will contact the factory and get it corrected for the upcoming Final submission (and 2014).

The Section 7 CSI in the test group application appears to show the correct values as also shown below:

Target Coef A (lbf)	Target Coef B (lbf/mph)	Target Coef C (lbf/mph^2)
27.876	0.05426	0.01618

Our Certification test vehicle had the ESP permanently deactivated so we will have to inquire about the procedure for deactivating it in a production car and get back with you hopefully tomorrow.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Snyder, Jim [<mailto:Snyder.Jim@epa.gov>]  
**Sent:** Thursday, January 09, 2014 12:00 PM  
**To:** Rodgers, William (EEO)  
**Subject:** FW: equivalent test weight and target coefficients for a vw jetta hybrid

Hi Bill, Happy New Year. Someone from the other division is testing a Jetta hybrid and asked for target coefficients. I sent them the official numbers from the 2013 common file w/o looking at them. The ABCs for the Hybrid are really high, not the ones we used for testing. Now that I look at them, the Target ABCs for the hybrid (that we used) are 20% lower than the regular hybrid. Can you find why the Hybrid's road load is lower than the standard version? Or is that table in the common section totally wrong?

Separate question, They are getting ABS and Traction lights. What is the procedure to get rolls mode? I don't recall this running 4 wheel dyno.

**From:** Doorlag, Mark  
**Sent:** Friday, December 20, 2013 1:17 PM  
**To:** Snyder, Jim  
**Cc:** Wright, DavidA  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

jim,

- the track coefficient units are listed using "lb ft." is this just a typo and should it be "lbf."

- it is also surprising to see such large a large target A coefficient, especially in comparison to the other jettas. this doesn't seem right.

- if i get the info from the 2013 data found at <http://www.epa.gov/otaq/tcldata.htm> it shows the same ETW but it gives the following track coefficients...

Target Coef A (lbf)	Target Coef B (lbf/mph)	Target Coef C (lbf/mph^2)
27.876	0.05426	0.01618

could vw be contacted to confirm that the values above are correct? or do you have another suggestion?

mark

**From:** Snyder, Jim  
**Sent:** Tuesday, December 17, 2013 6:52 PM  
**To:** Doorlag, Mark  
**Cc:** Wright, DavidA  
**Subject:** RE: equivalent test weight and target coefficients for a vw jetta hybrid

From VW's FOI\_DVWXB\_COMMON file. The 1<sup>st</sup> line is for room temp conditions, the 2<sup>nd</sup> line is for 20F Cold testing.

Section 12VW Pg 4	Vehicle Test Parameters	Engine Code	R.CH-No.:	Revision Date
Common Section	All	All		02-24-2013

#### Exhaust Test Parameters

Model / Carline	Engine Displ./HP	Engine Code	Tires	TM / OD #	Axle	ETW	Road Track Coefficients			TCDT	Fuel tank Cap.	Fan Pos.	Shift Sched. I.D.	Test Fuel	[ ]
							F0	F1	F2						
	[liter/hp]					[lbs]	[lb ft]	[ lb ft / mph ]	[ lb ft / (mph) <sup>2</sup> ]	[sec]	40% 100% [ ]				
Golf 2 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0188	-	22.0 55.0	A	M5-1	Tier 2	5V
Golf 4 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0188	-	22.0 55.0	A	M5-1	Tier 2	5V
Jetta	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3500	30	0.20	0.0188	-	22.0 55.0	A	M5-1	Tier 2	5V
Golf 2 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3375	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V
Golf 4 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3500	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	37	0.32	0.0188	-	22.0 55.0	A	L6	Cold CO	5V
Jetta Hybrid	1.4 / 150	CNLA	195/65R15	L6 /2	1) 4.438 2) 3.227	3625	124	0.15	0.0278	23.61	45 <sup>18</sup>	A	L6	Tier 2	DV
Jetta Hybrid	1.4 / 150	CNLA	195/65 R15	L6 /2	1) 4.438 2) 3.227	3625	136	0.165	0.0306	-	45 <sup>18</sup>	A	L6	Cold CO	DV

#) OD = Overdrive, 1 =final gear ratio >1 ; 2 =final gear ratio < 1

\*) value = pre stage x axle

**From:** Doorlag, Mark

**Sent:** Monday, December 09, 2013 2:06 PM

**To:** Snyder, Jim

**Cc:** Wright, DavidA

**Subject:** equivalent test weight and target coefficients for a vw jetta hybrid

jim,

can you help me out with a ETW and target coefficients for a vw jetta hybrid? here is the more detailed info...

2013 vw jetta hybrid

vin

**Ex. 6**

test group

DVWXV01.4PHE

tires

continental 195/65R15 91H

thanks, mark



Section 12VW	Pg 4	Vehicle Test Parameters	Engine Code	R.CH-No.:	Revision Date
Common Section	All		All		02-24-2013

# Exhaust Test Parameters

Model / Carline	Engine Displ./HP	Engine Code	Tires	TM / OD #	Axle	ETW	Road Track Coefficients			TCDT	Fuel tank Cap.	Fan Pos.	Shift Sched. I.D.	Test Fuel	DF source
	[lited/np]					[lbs]	F0 [lb ft]	F1 [lb ft / mph]	F2 [lb ft / (mph) <sup>2</sup> ]	[sec]	40% 100% []				

Golf 2 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3500	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 2 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3375	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3500	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	37	0.32	0.0188	-	22.0 55.0	A	L6	Cold CO	5V257

Jetta Hybrid	1.4 / 150	CNLA	195/65R15	L6 / 2	1) 4.438 2) 3.227	3625	124	0.15	0.0278	23.61	18 45	A	L6	Tier 2	DVPHE
Jetta Hybrid	1.4 / 150	CNLA	195/65 R15	L6 / 2	1) 4.438 2) 3.227	3625	136	0.165	0.0306	-	18 45	A	L6	Cold CO	DVPHE

#) OD = Overdrive, 1 =final gear ratio >1 ; 2 =final gear ratio < 1

) value = pre stage x axle

Section 12VW	Pg 4	Vehicle Test Parameters	Engine Code	R.CH-No.:	Revision Date
Common Section	All		All		02-24-2013

### Exhaust Test Parameters

Model / Carline	Engine Displ./HP	Engine Code	Tires	TM / OD #	Axle	ETW	Road Track Coefficients			TCDT	Fuel tank Cap.	Fan Pos.	Shift Sched. I.D.	Test Fuel	DF source
	[lited/np]					[lbs]	F0 [lb ft.]	F1 [lb ft./ mph]	F2 [lb ft./ (mph) <sup>2</sup> ]	[sec]	40% 100% []				

Golf 2 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3375	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	M 5 / 2	3.647	3500	30	0.20	0.0186	-	22.0 55.0	A	M5-1	Tier 2	5V257
Golf 2 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3375	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Golf 4 door	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3500	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	33	0.29	0.0171	-	22.0 55.0	A	L6	Tier 2	5V257
Jetta	2.5 / 150	BGQ	205/55 R16	L 6 / 2	3.504	3625	37	0.32	0.0188	-	22.0 55.0	A	L6	Cold CO	5V257

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Jetta Hybrid	1.4 / 150	CNLA	195/65 R15	L6 /2 1) 4.438 2) 3.227	3625	136	0.165	0.0306	-	18 45	A	L6	Cold CO	DVPHE

#) OD = Overdrive, 1 =final gear ratio >1 ; 2 =final gear ratio < 1

) value = pre stage x axle

To: [Redacted] **Ex. 7**  
[Redacted] **Ex. 7** [Redacted]@vw.com]; US EPA[US EPA@epa.gov]; Snyder,  
Jim[Snyder.Jim@epa.gov]

From: Snyder, Jim

Sent: Thur 6/18/2015 2:28:55 PM

Subject: Conference call with +1 (734) 214-4946, [Redacted] **Non-Responsive** [Redacted] **Ex. 7** [Redacted]@vw.com, US EPA

Conference call with +1 (734) 214-4946, [Redacted] **Non-Responsive** [Redacted] **Ex. 7** [Redacted]@vw.com, US EPA

Duration: 57 Minutes 56 Seconds

+1 (734) 214-4946

Other: +1 (734) 214-  
4946

**Non-Responsive**

Other: **Non-Responsive**

[Redacted] **Ex. 7** [Redacted]@vw.com

Email: [Redacted] **Ex. 7** [Redacted]@vw.com

IM: [Redacted] **Ex. 7** [Redacted]@vw.com

US  
EPA

Microsoft Lync

From: **Ex. 7**  
Location: Conf Call  
Importance: Normal  
Subject: CARB-EPA-VW Diesel Conf Call  
Start Date/Time: Thur 9/17/2015 5:00:00 PM  
End Date/Time: Thur 9/17/2015 7:00:00 PM

.....  
>>>>>

Good Morning,  
Please see below for dial-in information. Conf ID is  
at the bottom.  
Thanks

**Ex. 7**

EPA:  
Byron Bunker  
Linc Wehrly  
Jim Snyder  
CARB:

**Ex. 7**

.....  
 Join Skype Meeting

This is an online meeting for Skype  
for Business, the professional  
meetings and communications app

formerly known as Lync.

## Join by phone

**Ex. 7**

(Auburn Hills) English (United States)  
(Auburn Hills) English (United States)  
(Auburn Hills) English (United States)  
(Auburn Hills) English (United States)

[Find a local number](#)

Conference ID: **Ex. 7**

[Forgot your dial-in PIN?](#) | [Help](#)

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This is an online meeting for Skype for Business, the professional meetings and communications app formerly known as Lync.

**Ex. 7** (Auburn Hills) English (United States)  
(Auburn Hills) English (United States)  
(Auburn Hills) English (United States)  
(Auburn Hills) English (United States)

Conference ID: **Ex. 7**

.....  
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## Ex. 7

## Ex. 7

Find a local number

Conference ID: **Ex. 7**

Forgot your dial-in PIN? [Help](#)

**From:** Snyder, Jim

**Required Attendees:** Wehrly, Linc; Wright, DavidA; Ott, Franz; Dalton, Joel; French, Roberts; Ex. 7 Good, David

**Optional Attendees:** Ex. 7

**Location:** AA-Room-Office-N66-ConfRoom/AA-OTAQ-OFFICE

**Importance:** Normal

**Subject:** VW PHEV label calculation and BEV testing

**Start Date/Time:** Thur 7/10/2014 1:30:00 PM

**End Date/Time:** Thur 7/10/2014 2:30:00 PM

2015 PHEV calculations Berechnungsvorlage 02.pptx



**To:** Joel Ball/AA/USEPA/US@EPA[]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]  
**From:** "Hennard, Mike"  
**Sent:** Wed 9/30/2009 4:51:07 PM  
**Subject:** RE: VERR 2009/08/07  
[mike.hennard@vw.com](mailto:mike.hennard@vw.com)

Joel:

I tried to contact you by telephone several times this week. Thus – I will send reply to your questions via e-mail.

- 1) VWGoA has submitted EDIR reports covering this topic for vehicles involved in glow plug replacement Service Action.
- 2) VWGoA issued an additional VERR regarding glow plug replacement for all vehicles involved on August 6, 2009.
- 3) VWGoA released this Service Action to assure customer satisfaction relating to glow plugs with the technical repair being updating all vehicles with ceramic type glow plugs to the later version steel glow plug .

If you require any additional information regarding this issue, please do not hesitate to call me to discuss.

Michael Hennard

Manager - Emissions Compliance EEO

Volkswagen Group of America

3800 Hamlin Road

Auburn Hills, MI 48326

Telephone Number: 248 754 4202

Fax: 248 754 4207

mike.hennard@vw.com

From: Kohnen, Christoph (VWGoA)  
Sent: Monday, September 28, 2009 4:59 PM  
To: Hennard, Mike  
Subject: Fw: VERR 2009/08/07

Please let's discuss!!  
Dr. C. Kohnen  
Engineering and Environmental Office VWGoA

Send by Blackberry

From: Ball.Joel@epamail.epa.gov <Ball.Joel@epamail.epa.gov>  
To: Kohnen, Christoph (VWGoA)  
Sent: Mon Sep 28 16:31:39 2009  
Subject: VERR 2009/08/07

Hello Mr. Kohnen,

I received the mentioned VERR. I was a little surprised to see that VW is replacing the glow plugs as part of the repair procedure. Could you please explain the reason for replacing the glow plugs? Were there failures or defects found? If so, was there a defect report issued for these problems? Will there be a VERR issued to replace the glow plugs on automatic transmission vehicles?

Best Regards,

Joel Ball  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4238  
ball.joel@epa.gov

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=David Good/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA  
**Sent:** Mon 1/25/2010 9:06:48 PM  
**Subject:** Fw: Meeting with VW/Audi on HEV cert and testing

Next week, Lothar Rech from Audi will be visiting our offices. He has requested that I contact EPA and try to set up a meeting, primarily as a follow-up to the meeting we had last September 24, 2009. Topics would include the following:

Test groups for conventional and hybrid vehicle.

Hybrid test matrix and open SOC measurement for SC03 and COLD CO tests.

Status EPA "Dear Manufacturer" letter for hybrid test procedures.

Open points from September 2009 meeting.

Soak times and tests series for conformity tests.

Steps necessary to get an EPA certificate for an electric vehicle.

With respect to the open points from the September 24, 2009 meeting, I will provide you with a brief report of my understanding of those points.

We would be available to meet next Wednesday, January 27, 2010 or Thursday, January 28, 2010. Please let me know if either of these dates would be acceptable and your preferred time.

Just FYI - I have checked my notes from the September 24, 2009 meeting and EPA participants included Linc Wehrly, Marty Reineman, Tom Anderson, Joel Ball, Chris Nevers, Steve Healy, and you.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886

FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 2/22/2010 8:41:59 PM  
**Subject:** VW/Audi: additional questions on EV,PHEV cert

additional questions from VW regarding certification of EVs, FCEVs, PHEV etc.

I'll try to get some more specifics so we know who is needed to attend.

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/17/2010 3:02:54 PM  
**Subject:** Audi Meeting with EPA: Discussion topics

Audi AG has provided a more refined list of discussion topics. These are shown below:

EPA Meeting

- \* Idle stop system – Last mode strategy
- \* Worst case mode for emission certification and OBD emission impact tests
- \* EPA position on Evap Test procedure for PHEV
- \* HEV application for certification
- \* New emission related components for MY 2012 GHG
- \* MIL on and additional information / text message
- \* Audi Hybrid and battery cooling at the dynamometer
- \* Clarification of dynamometer test mode for future vehicles

See you on Thursday.

**To:** Linc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA[]; Jim Snyder/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA[]; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA[]; Chris Nevers/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA[]; Joel Ball/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Fri 9/24/2010 12:57:42 PM  
**Subject:** EPA/Audi Meeting Report  
Meeting Report AUG 19 2010.doc

Hello all:

Attached is a copy of a report from a meeting between you and representatives of Audi AG and Volkswagen Group of America, Inc. This meeting was held on August 19, 2010.

Please note the open issues in the "Comments" section.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com



**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** []

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Tue 12/14/2010 10:48:45 PM

**Subject:** Audi phone conference: Start/stop and manual trans

EPA room phone is **Non-Responsive**

I will try to get some materials to you prior to the call. To be more specific about the topics:

1. General discussion concerning start-stop devices.
2. Shift speeds for manual transmission vehicles with start-stop devices

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 8/22/2011 9:18:56 PM  
**Subject:** Mtg with VW Audi: PHEV fuel economy, labeling and misc certification

We have some folks visiting the US for a number of meetings, and would like to use the opportunity to discuss PHEV fuel economy and labeling, and other certification/emission testing topics. We would like about 2 hours in the afternoon.

Best regards,  
Len

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** []

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Mon 12/12/2011 10:52:27 PM

**Subject:** Handouts for VW Pre-Cert mtg  
[2013 VW CERT preview letter.pdf](#)  
[CBI DVWXV COMMON CR1 CAR.PDF](#)

Preview letter and GHG Pre Model Year report

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=David  
Good/OU=AA/O=USEPA/C=US@EPA;CN=DavidA  
Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=David  
Good/OU=AA/O=USEPA/C=US@EPA;CN=DavidA  
Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
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Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=DavidA  
Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=Joel  
Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
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Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
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Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; illiam.Rodgers@vw.com[]  
**Cc:** Leonard.Kata@vw.com;michael.giles@vw.com[]; ichael.giles@vw.com[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 4/4/2012 2:25:28 PM  
**Subject:** VW Group - Audi A8 w/Start/Stop and Cyl Deactivation Test Drive  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

I reserved a room in case we want an pre-drive intro but primary a test drive opportunity of the Audi S/S system .

---

Hello Jim,

We would like to schedule time at your facility on Tuesday afternoon May 8th to allow you and EPA staff to test drive a 2013 Audi A8 4.0L V8 equipped with Start-Stop and Cylinder Deactivation technologies. We plan to have Audi Engineers available during the time of the test drives to answer any questions that you or other staff may have. Please let us know if this date is acceptable and what block of time will work best for you. As you know, Audi representatives will already be at EPA for confirmatory testing the morning of May 8 and 9th so either afternoon is acceptable for us. An alternative might be Monday May 7th after we deliver the test vehicle but the fore mentioned dates are preferred.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Chris Nevers/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schmidt, Oliver" [Oliver.Schmidt@vw.com]; avid Good/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schmidt, Oliver" [Oliver.Schmidt@vw.com]; oel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schmidt, Oliver" [Oliver.Schmidt@vw.com]; inc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schmidt, Oliver" [Oliver.Schmidt@vw.com]; artin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schmidt, Oliver" [Oliver.Schmidt@vw.com]; tephen Healy/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schmidt, Oliver" [Oliver.Schmidt@vw.com]; avidA Wright/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schmidt, Oliver" [Oliver.Schmidt@vw.com]; oel Dalton/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schmidt, Oliver" [Oliver.Schmidt@vw.com]; illiam Ott/AA/USEPA/US@EPA;"Schmidt, Oliver" [Oliver.Schmidt@vw.com]; Schmidt, Oliver" [Oliver.Schmidt@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Kata, Leonard"  
**Sent:** Tue 5/1/2012 9:31:55 PM  
**Subject:** Meeting with Audi - Start-Stop Device  
[leonard.kata@vw.com](mailto:leonard.kata@vw.com)

Hi Jim:

Just to keep you informed, Audi is coming to the May 8 meeting prepared to provide a review of the system and respond to the points that you mentioned to me (i.e., enable conditions, operation during reasonable drive conditions, panic stop, stop-and-go traffic, etc).

As you know, we have some Audi confirmatory testing going on at EPA so the Audi personal already there will attend the meeting and be able to respond to any questions. Participants from our side include:

- Karlheinz Kissling (Audi AG)
- Carsten Stang (Audi AG)

- Andy Kramer (Audi AG)
- Mark Banzer (Audi AG)
- Oliver Schmidt (VWGoA – General Manager EEO)
- Leonard Kata (VWGoA)
- William Rodgers (VWGoA) (tentative)

Mr. Schmidt is my current Manager and successor to Christoph Kohnen. He would appreciate the opportunity to meet EPA staff involved in emission certification and policy at this meeting.

Let me know if you have any further questions.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/17/2012 9:14:41 PM  
**Subject:** VW and EPA Meeting - MPI/FSI Fuel Injection System

Len, Please add the above people to your mtg invitation in case they are interested.

This is a web mtg with Germany on their upcoming multipoint/direct injection fuel system on May 30 at 8am.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



**To:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; inc Wehrly/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; oel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; illiam Ott/AA/USEPA/US@EPA[]  
**Cc:** "Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]; Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 5/17/2012 9:22:56 PM  
**Subject:** VW and EPA Meeting - MPI/FSI Fuel Injection System

When: Wednesday, May 30, 2012 8:00 AM-9:00 AM (GMT-05:00) Eastern Time (US & Canada).  
Where: Online Meeting

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

To all:

I have scheduled an online meeting to discuss the Volkswagen Group MPI/FSI Fuel Injection System. If this time is not acceptable or you cannot join this meeting through the internet connection provided, please let me know.

Jim:

I have added the names that you mentioned.

Best regards,

Len

-----  
Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
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.....

# Non-Responsive

Forgot your dial-in PIN?<<https://dialin.vw.com>> | First online  
meeting?<<http://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>>  
[!OC([1033])!]

---

**To:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]; Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; inc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; [Redacted] im Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: [Redacted] oel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; [Redacted] oel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; [Redacted] tephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; [Redacted] hris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; [Redacted] avidA Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; [Redacted] illiam Ott/AA/USEPA/US@EPA; [Redacted] Stender, Detlef (EASZ/1)" [detlef.stendel@volkswagen.de]

**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Kata, Leonard (EEO)"

**Sent:** Tue 5/29/2012 2:02:52 PM

**Subject:** VW and EPA Meeting - MPI/FSI Fuel Injection System  
03 mpi-fsi-injection\_system FINAL.pptx

To all:

Tomorrow, May 30, 2012 at 0800 Detroit Time, we have scheduled a VW/EPA web conference to discuss the MPI/FSI fuel injection system.

I have attached a back-up copy of the slides that will be presented.

Please refer to the meeting invitation for connection details.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

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E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** Joel Ball/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Wed 5/30/2012 12:11:09 PM  
**Subject:** FW: VW and EPA Meeting - MPI/FSI Fuel Injection System  
03 mpi-fsi-injection\_system FINAL.pptx

From: Kata, Leonard (EEO)  
Sent: Tuesday, May 29, 2012 10:03 AM  
To: Peter, Juergen (EASZ/1); Rech, Lothar (I/EA-523); Dorer, Frank, Dr. (EAES/3); Vieser, Steffen (I/EA-83); Schmidt, Oliver (EEO); Wehrly.Linc@epamail.epa.gov; 'Jim Snyder'; Ball.Joel@epamail.epa.gov; 'Dalton.Joel@epamail.epa.gov'; Healy.Stephen@epamail.epa.gov; Nevers.Chris@epamail.epa.gov; 'Wright.DavidA@epamail.epa.gov'; 'Ott.William@epamail.epa.gov'; \$Redacted;  
Stendel, Detlef (EASZ/1)  
Cc: Rodgers, William (EEO); Giles, Michael (EEO)  
Subject: VW and EPA Meeting - MPI/FSI Fuel Injection System

To all:

Tomorrow, May 30, 2012 at 0800 Detroit Time, we have scheduled a VW/EPA web conference to discuss the MPI/FSI fuel injection system.

I have attached a back-up copy of the slides that will be presented.

Please refer to the meeting invitation for connection details.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

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E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/31/2012 6:57:32 PM  
**Subject:** Re: Testing Strategy Approval Request - Audi A8 Start/Stop Systems  
[winmail.dat](#)

Richard,

Background: In a May 8, 2012 meeting, VW/Audi staff presented EPA with a description of the stop/start system and cylinder deactivation system for these 2013 Audi A8 vehicles. The vehicle is equipped with what you called "Last-mode functionality," where the last stop/start setting (enable/disable mode) is restored after stopping and restarting the vehicle. In other words, the stop/start button is "latched" when stopping and restarting the vehicle. Although I had a conflict on May 8, 2012 and didn't get to drive the vehicle, it's my understanding that the May 8, 2012 drive was acceptable to all EPA engineers who drove it (including both the stop/start feature and the cylinder deactivation feature of the vehicle).

Regarding your current request to perform one test for the Highway, SC03 and Cold FTP cycle (and two sets of FTP and US06 tests----with and without the stop/start system enabled), we believe that your request sounds reasonable to us, and it is hereby approved.

Please call or email me if you have questions about this email.

Regards

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: David Good/AA/USEPA/US@EPA, Jim Snyder/AA/USEPA/US@EPA  
Cc: Linc Wehrly/AA/USEPA/US@EPA, "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
Date: 05/21/2012 09:02 AM  
Subject: Testing Strategy Approval Request - Audi Start/Stop Systems

Hello Dave;

After our visit with the demonstration 4.0L V8 Audi A8 on May 8th and equipped with cylinder deactivation and start/stop strategy, we reviewed our testing strategy and have the following request.

The 3.0L V6 engine equipped Audi A8 emission data vehicle tested on May 2nd and May 8th at the EPA facility, was tested in two configurations. That is: complete five cycle tests with start/stop active and a complete second set of tests with start/stop system inactive at our facility in Ingolstadt . EPA confirmed the city tests in both configurations, start/stop active and inactive. Under the start/stop enable conditions you saw during the presentation, it is clear that the engine does not stop during three of the 5-cycle tests. There is no engine shut down in Highway, SC03 and Cold CO test cycles and only marginal engine stop in the US06 test cycle. The current start/stop strategy would yield on minor fuel economy improvement in the FTP and US06 cycle and therefore we would prefer to test only the FTP and US06 harmonically average the two sets of test configurations together at the 50/50 rate.

The high cost testing burden at our facility would be lessened and testing capacity could improve. Until which time there are some operational start/stop system strategy changes, we would propose to test only the FTP and US06 with start/stop active and inactive and average these tests at the 50/50 rate.

If you have any questions, please contact me directly.

Best regards,  
Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com<mailto:Richard.Thomas@VW.com>



**To:** Joel Ball/AA/USEPA/US@EPA;"Berenz, Sebastian (EEO)"  
[Sebastian.Berenz@vw.com]; Berenz, Sebastian (EEO)"  
[Sebastian.Berenz@vw.com]

**From:** [Ex. 7]

**Sent:** Thur 6/14/2012 5:38:49 PM

**Subject:** RE: IUVP High Mileage Program MY2007

[ball.joel@epa.gov](mailto:ball.joel@epa.gov)

[Sebastian.Berenz@vw.com](mailto:Sebastian.Berenz@vw.com)

[sebastian.berenz@vw.com](mailto:sebastian.berenz@vw.com)

<http://www.volkswagen.com>

Hi Sebastian,

ARB is ok with your plan.

**Ex. 7**

From: Joel Ball [mailto:Ball.Joel@epamail.epa.gov]

Sent: Thursday, June 14, 2012 10:37 AM

To: Berenz, Sebastian (EEO)

Cc: [Ex. 7]

Subject: Re: IUVP High Mileage Program MY2007

Hi Sebastian,

Your plan is acceptable to EPA. Please confirm with J. [Ex. 7] from ARB as well.

Joel Ball  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4238  
[ball.joel@epa.gov](mailto:ball.joel@epa.gov)

From: "Berenz, Sebastian (EEO)" <Sebastian.Berenz@vw.com>  
To: Joel Ball/AA/USEPA/US@EPA  
Date: 06/14/2012 09:57 AM  
Subject: IUVP High Mileage Program MY2007

Hello Mr. Ball,

We are about to finish our MY2007 high mileage program and we find one big problem to procure the 75% of the useful life vehicle.

- 7VWXT03.6276
- Touareg/Q7
- 20229 vehicles sold
- 3.6L / VR6 (FSI) 276 hp / 280 hp
- LEVII/Bin5
- 75% useful life: 90.000mi

The vehicle should have 90.000mi or more. The closest vehicle we can find in Michigan and/or California is 85.000mi though 400 letters to customers.

I would like to bring the vehicle in this week, in order to stay in the time schedule.

I will proceed that way unless instructed otherwise from you.

Thank you very much.  
Best regards

Sebastian Berenz

Manager In-Use Emission Compliance  
Engineering Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America

Phone: (248) 754-4211  
Cell: (248) 736-3487  
FAX: (248) 754-4207  
E-Mail: sebastian.berenz@vw.com

<http://www.volkswagen.com>

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Joel Ball/AA/USEPA/US@EPA; "[Ex. 7]@arb.ca.gov)"  
[Ex. 7]@arb.ca.gov]; [Ex. 7]@arb.ca.gov" [Ex. 7]@arb.ca.gov]  
**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Johnson, Stuart (EEO)"  
[Stuart.Johnson@vw.com]; Horton, Garrett" [Garrett.Horton@vw.com]  
**From:** "Berenz, Sebastian (EEO)"  
**Sent:** Fri 8/3/2012 5:59:49 PM  
**Subject:** Volkswagen and Audi IUV Program MY2007 and MY2011  
[sebastian.berenz@vw.com](mailto:sebastian.berenz@vw.com)  
<http://www.volkswagen.com>

Hello [Ex. 7]

Hello Joel,

I just want to let you know, that we finished our IUV program for high mileage MY2007 and low mileage MY2011 program as of today.

All vehicles are tested and submitted through Verfiy.

MY2007 High Mileage Program:

- 8 test groups
- 41 vehicles tested and submitted
- 9 SHED+ORVR

MY2011 Low Mileage Program:

- 15 test groups
- 29 vehicles tested and submitted
- 9 SHED+ORVR

We are planning to start the next program (high mileage MY2008) by October this year in our new laboratory in Oxnard, CA.

Please let me know if you have any questions.

Best regards

Sebastian Berenz

Manager In-Use Emission Compliance

Engineering Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

United States of America

Phone: (248) 754-4211  
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FAX: (248) 754-4207  
E-Mail: sebastian.berenz@vw.com

<http://www.volkswagen.com>

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**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; liver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; tuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/7/2012 4:06:59 PM  
**Subject:** VW/EPA mtg - Merger of VW & Porsche

**To:** Joel Ball/AA/USEPA/US@EPA[]  
**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Ballin, Ralph (K-GQP/1)" [Ralph.Ballin@volkswagen.de]; Braun, Hubert-Martin (I/GS-6)" [hubert.braun@audi.de]  
**From:** "Hennard, Mike (EEO)"  
**Sent:** Tue 9/11/2012 2:28:40 PM  
**Subject:** Notification of Pro Active Extended Warranty by VWGoA - Secondary Air Pressure Sensor  
[mike.hennard@vw.com](mailto:mike.hennard@vw.com)

Joel:

Volkswagen Group of America has decided to proactively extend the Federal Emissions Warranty (to full useful life) for replacement of the Secondary Air Pressure Sensor on the following 2.5L Volkswagen vehicles in the US market:

Test Group	Affected Models	Emissions Concept
9VWXV02.5257	Volkswagen Jetta / Jetta Sportwagen	LEV II – SULEV / Tier 2 – Bin 2
AVWXV02.5259	Volkswagen Jetta / Jetta Sportwagen	LEV II – SULEV / Tier 2 – Bin 3
BVWXV02.5259	Volkswagen Jetta / Jetta Sportwagen	LEV II – SULEV / Tier 2 – Bin 3
CVWXV02.5259 CW: 47/ 11)	Volkswagen Jetta / Jetta Sportwagen	LEV II – SULEV / Tier 2 – Bin 3 (<

Replacement parts installed on vehicles within this extended warranty will be manufactured with improved process from a new vendor to assure that the highest quality level component is installed on customer vehicles. Customers will be notified of this extended warranty program in the near future and the proper VERR reports (with additional details) will be submitted to EPA when supporting documents become available.

As usual, if you have any questions, please do not hesitate to contact me directly.

Michael Hennard

Senior Manager - Emissions Compliance EEO

Volkswagen Group of America

3800 Hamlin Road

Auburn Hills, MI 48326

Telephone Number: 248 754 4202

Fax: 248 754 4207

mike.hennard@vw.com

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;Domenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA; [Ex. 7]; CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE; [Ex. 7] CN=R  
oberts French/OU=AA/O=USEPA/C=US@EPA[]; omenic.Rist@audi.de;CN=Joel  
Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA; [Ex. 7] CN=Linc  
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French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Tom  
Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom  
Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/17/2012 3:04:06 PM  
**Subject:** Audi Mtg w/ EPA rm 601C

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

[Ex. 7]

**Ex. 7**



**To:** Joel Ball/AA/USEPA/US@EPA[]  
**Cc:** [Ex. 7]@arb.ca.gov; [Ex. 7]@arb.ca.gov; Barke, Matthias"  
[Matthias.Barke@vw.com]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Johnson,  
Stuart (EEO)" [Stuart.Johnson@vw.com]; Horton, Garrett" [Garrett.Horton@vw.com]  
**From:** "Berenz, Sebastian (EEO)"  
**Sent:** Mon 9/17/2012 10:54:10 PM  
**Subject:** VW's new laboratory - audit schedule  
[sebastian.berenz@vw.com](mailto:sebastian.berenz@vw.com)

Hello Joel,

I would like to inform you that we finally moved our emissions laboratory from Westlake, CA to Oxnard, CA.

We are proud that the operation is now set up and ready to run the first tests.

Mr. Matthias Barke, the general manager of the Volkswagen Oxnard test facility, already informed [Ex. 7] and scheduled an appointment for an audit of the new laboratory.

[Ex. 7] gave us the "go" to run in-use emission tests from today on until he comes in on November 6th 2012 to check the equipment and procedures we use and hopefully certifies the lab.

The analyzing equipment we is the same than in Westlake, we basically only got new dynamometers and SHED chambers.

Since I don't want to get in any conflict with our time schedule for the IUVP program, I would like to start procuring and testing the first MY2008 high mileage customer vehicles by the beginning of October 2012. That will be before ARB has performed the audit.

When [Ex. 7] comes in, I will show him what we tested until that point and I believe we talk about the IUVP program we already finished earlier this year.

I am confident that we fulfill all requirements. We will make sure that the quality of our processes and the high standard of testing you are used to from our "old" Westlake operation over the years will be maintained.

Matthias and his group is working hard to get the last peaches together, but the correlation between our old lab and the new one are already almost identical.

My only question is, what do I need to do to create the new dyno settings in the "Verfiy System" to be able to submit the tests we performed throughout the IUVP?

Could you please advise who to contact and what exact information he/she will need?

Would be great if you could help me out with that.

Please let me know if you have any concerns or questions.

I will proceed that way unless instructed otherwise from you.

Thank you very much.

Best regards,

Sebastian Berenz

Manager In-Use Emission Compliance

Engineering Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

United States of America

Phone: (248) 754-4211  
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E-Mail: sebastian.berenz@vw.com

<http://www.volkswagen.com>

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;Domenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; omenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; othar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; liver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Thur 9/20/2012 3:20:28 PM

**Subject:** Rescheduled: RE: Audi Meeting with EPA (Oct 29 01:00 PM EDT in AA-C126/AA-OTAQ-OFFICE@EPA)

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;Domenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; omenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; othar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; liver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Wed 9/26/2012 11:21:54 PM

**Subject:** Rescheduled: RE: Audi Meeting with EPA (Oct 29 01:00 PM EDT in AA-601C/AA-OTAQ-LAB@EPA)

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;Domenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; omenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; othar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; liver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Wed 9/26/2012 11:24:44 PM

**Subject:** Information Update - Subject has changed: Audi Mtg w/ EPA rm 601C

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

Len

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Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification

To: Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; oel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; inc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; oberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; obert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; om Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; ichael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; lan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; ntonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; lenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad

Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; aul  
Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"  
[Domenic.Rist@audi.de]; ad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"  
[Domenic.Rist@audi.de]; Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Rech,  
Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]  
**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Johnson, Stuart (EEO)"  
[Stuart.Johnson@vw.com]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Sat 10/20/2012 2:48:29 PM  
**Subject:** Volkswagen Group Meetings with USEPA  
00 Draft Agenda EPA Cert-Test.pdf  
00 Draft Agenda Tier3.pdf

To all:

The Volkswagen Group has two meeting scheduled with EPA on Monday October 29, 2012.

At this time, I am writing to forward the attached copies of both agendas for your reference and planning.

1. The first meeting involves certification, test procedure, and labeling topics and our primary EPA contact is Jim Snyder. The meeting takes place from 1:00 – 3:00 p.m.
2. The second meeting addresses "Tier 3" topics, and our primary EPA contact is Michael Olechiw. The meeting takes place from 4:00 to 5:00 p.m.

We look forward to seeing you in Ann Arbor on the 29th.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)



**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; inc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; obert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; om Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]

**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Johnson, Stuart (EEO)" [Stuart.Johnson@vw.com]; Tamborra, Nick (EEO)" [Nick.Tamborra@vw.com]

**From:** "Kata, Leonard (EEO)"

**Sent:** Mon 10/29/2012 12:58:15 PM

**Subject:** Slides for Today's EPA/VW/Audi Meeting  
00\_Agenda\_EPA\_Cert-Test.pptx  
01\_Start\_Stop\_Survey.pptx  
02\_FFV.pptx

1 OF 4

To all:

Attached are our slides for the meeting scheduled at 1:00 p.m. today.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; im Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; inc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; obert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; om Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]

**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Johnson, Stuart (EEO)" [Stuart.Johnson@vw.com]; Tamborra, Nick (EEO)" [Nick.Tamborra@vw.com]

**From:** "Kata, Leonard (EEO)"

**Sent:** Mon 10/29/2012 1:00:37 PM

**Subject:** RE: Slides for Today's EPA/VW/Audi Meeting  
[03\\_AWC.pptx](#)  
[04\\_BEV\\_EPA.pptx](#)  
[leonard.kata@vw.com](mailto:leonard.kata@vw.com)

2 OF 4

From: Kata, Leonard (EEO)  
 Sent: Monday, October 29, 2012 8:58 AM  
 To: 'Jim Snyder/AA/USEPA/US'; 'Chris Nevers/AA/USEPA/US'; 'Joel Ball/AA/USEPA/US'; 'Joel Dalton/AA/USEPA/US'; 'wehrly.linc@epa.gov'; 'Roberts French/AA/USEPA/US'; 'Robert Peavyhouse/AA/USEPA/US'; 'Tom Anderson/AA/USEPA/US'; Sigelko, Jenny (EEO)  
 Cc: Schmidt, Oliver; Johnson, Stuart (EEO); Tamborra, Nick (EEO)  
 Subject: Slides for Today's EPA/VW/Audi Meeting

1 OF 4

To all:

Attached are our slides for the meeting scheduled at 1:00 p.m. today.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

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**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; inc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; obert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; om Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]

**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Johnson, Stuart (EEO)" [Stuart.Johnson@vw.com]; Tamborra, Nick (EEO)" [Nick.Tamborra@vw.com]

**From:** "Kata, Leonard (EEO)"

**Sent:** Mon 10/29/2012 1:02:46 PM

**Subject:** RE: Slides for Today's EPA/VW/Audi Meeting  
05\_BEVx\_2012\_EPA.ppt  
06\_SAE\_1634\_EPA.pptx  
leonard.kata@vw.com

3 OF 4

From: Kata, Leonard (EEO)  
Sent: Monday, October 29, 2012 9:01 AM  
To: Kata, Leonard (EEO); 'Jim Snyder/AA/USEPA/US'; 'Chris Nevers/AA/USEPA/US'; 'Joel Ball/AA/USEPA/US'; 'Joel Dalton/AA/USEPA/US'; 'wehrly.linc@epa.gov'; 'Roberts French/AA/USEPA/US'; 'Robert Peavyhouse/AA/USEPA/US'; 'Tom Anderson/AA/USEPA/US'; Sigelko, Jenny (EEO)  
Cc: Schmidt, Oliver (EEO); Johnson, Stuart (EEO); Tamborra, Nick (EEO)  
Subject: RE: Slides for Today's EPA/VW/Audi Meeting

2 OF 4

From: Kata, Leonard (EEO)  
Sent: Monday, October 29, 2012 8:58 AM  
To: 'Jim Snyder/AA/USEPA/US'; 'Chris Nevers/AA/USEPA/US'; 'Joel Ball/AA/USEPA/US'; 'Joel Dalton/AA/USEPA/US'; 'wehrly.linc@epa.gov'; 'Roberts French/AA/USEPA/US'; 'Robert Peavyhouse/AA/USEPA/US'; 'Tom Anderson/AA/USEPA/US'; Sigelko, Jenny (EEO)  
Cc: Schmidt, Oliver; Johnson, Stuart (EEO); Tamborra, Nick (EEO)  
Subject: Slides for Today's EPA/VW/Audi Meeting

1 OF 4

To all:

Attached are our slides for the meeting scheduled at 1:00 p.m. today.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

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Cell: (248) 797-3886

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**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; im Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; inc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; oberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; obert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; om Anderson/AA/USEPA/US@EPA;"Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]; Sigelko, Jenny (EEO)" [Jenny.Sigelko@vw.com]

**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Johnson, Stuart (EEO)" [Stuart.Johnson@vw.com]; Tamborra, Nick (EEO)" [Nick.Tamborra@vw.com]

**From:** "Kata, Leonard (EEO)"

**Sent:** Mon 10/29/2012 1:04:16 PM

**Subject:** RE: Slides for Today's EPA/VW/Audi Meeting  
[07\\_PHEV.pptx](#)  
[08\\_Energy\\_assist\\_EPA.pptx](#)  
[leonard.kata@vw.com](mailto:leonard.kata@vw.com)

4 OF 4

From: Kata, Leonard (EEO)  
Sent: Monday, October 29, 2012 9:03 AM  
To: 'Jim Snyder/AA/USEPA/US'; 'Chris Nevers/AA/USEPA/US'; 'Joel Ball/AA/USEPA/US'; 'Joel Dalton/AA/USEPA/US'; 'wehrly.linc@epa.gov'; 'Roberts French/AA/USEPA/US'; 'Robert Peavyhouse/AA/USEPA/US'; 'Tom Anderson/AA/USEPA/US'; Sigelko, Jenny (EEO)  
Cc: Schmidt, Oliver (EEO); Johnson, Stuart (EEO); Tamborra, Nick (EEO)  
Subject: RE: Slides for Today's EPA/VW/Audi Meeting



3 OF 4

From: Kata, Leonard (EEO)  
Sent: Monday, October 29, 2012 9:01 AM  
To: Kata, Leonard (EEO); 'Jim Snyder/AA/USEPA/US'; 'Chris Nevers/AA/USEPA/US'; 'Joel Ball/AA/USEPA/US'; 'Joel Dalton/AA/USEPA/US'; 'wehrly.linc@epa.gov'; 'Roberts French/AA/USEPA/US'; 'Robert Peavyhouse/AA/USEPA/US'; 'Tom Anderson/AA/USEPA/US'; Sigelko, Jenny (EEO)  
Cc: Schmidt, Oliver (EEO); Johnson, Stuart (EEO); Tamborra, Nick (EEO)  
Subject: RE: Slides for Today's EPA/VW/Audi Meeting

2 OF 4

From: Kata, Leonard (EEO)  
Sent: Monday, October 29, 2012 8:58 AM  
To: 'Jim Snyder/AA/USEPA/US'; 'Chris Nevers/AA/USEPA/US'; 'Joel Ball/AA/USEPA/US'; 'Joel Dalton/AA/USEPA/US'; 'wehrly.linc@epa.gov'; 'Roberts French/AA/USEPA/US'; 'Robert Peavyhouse/AA/USEPA/US'; 'Tom Anderson/AA/USEPA/US'; Sigelko, Jenny (EEO)  
Cc: Schmidt, Oliver; Johnson, Stuart (EEO); Tamborra, Nick (EEO)  
Subject: Slides for Today's EPA/VW/Audi Meeting

1 OF 4

To all:

Attached are our slides for the meeting scheduled at 1:00 p.m. today.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

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E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** CN=Bill Pidgeon/OU=AA/O=USEPA/C=US@EPA;CN=Chris  
Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA  
Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Tom  
Anderson/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];  
N=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA  
Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Tom  
Anderson/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];  
N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Tom  
Anderson/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];  
N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Tom  
Anderson/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];  
N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Tom  
Anderson/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];  
Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Tom  
Anderson/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];  
N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Tom  
Anderson/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];  
N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 12/13/2012 11:24:24 PM  
**Subject:** VW Pre-Cert Mtg



Tobias Glas

In-Use Emission Compliance Specialist

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E-Mail: Tobias.Glas@vw.com

As a backup you can contact also Mr. Garrett Horton with EEO at VWGoA for any in-use questions.

Garrett Horton

Engineering Analyst

Engineering & Environmental Office

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Fax: (248) 754-4207

E-Mail: Garrett.Horton@vw.com

Thank you very much for all the support during the last couple years. I really enjoyed working with all of you.

I am grateful for the opportunities that I had with this position and I am looking forward to start a new project.

Best regards,

Sebastian Berenz

In-Use Emission Compliance Specialist

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E-Mail: Sebastian.berenz@vw.com

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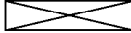
P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** edward.popa@audi.com[]  
**Cc:** CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com[];  
stuart.johnson@vw.com[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/24/2009 5:51:41 PM  
**Subject:** 2008, 2009 VW/Audi IUVP Test plan  
2005-09 IUVP Test Plan.308.doc

Edy,

re: 2008, 2009 IUVP Test plan

When you get a chance, please send Joel Ball and me the number of IUVP vehicles VW/Audi will test for the 2008 and 2009 model years. Please use the attached example format and change the numbers accordingly.

Joel Ball is going to take the lead for EPA on the IUVP program. You can email or call him (and  of CARB) with any IUVP questions you have about recruiting, testing, etc. If Joel is out of the office, I'll serve as his back-up, so feel free to contact me.

Joel will try to send you a snapshot of the IUVP data which we show in CFEIS and Verify so you can check your records.

Thanks

## IUVP Example Test Plan

Manufacturer \_\_\_\_\_ Date \_\_\_\_\_

### 2005, 2008 & 2009 MY IUVP Testing Requirements

Model Year & IUVP program	FTP Tests	US06 Tests	2-Day EVAP Tests	ORVR Tests	Estimated Completion Date
2004 high mileage					8/1/09
2005 high mileage	40	40	5	5	8/1/10
2006 high mileage					8/1/11
2007 high mileage					8/1/12
2008 high mileage					8/1/13
2009 high mileage					8/1/14
2008 low mileage	20	20	5	5	8/1/09
2009 low mileage	20	20	5	5	8/1/10



c://1iuvp/2003-07 iuvp test plan.308.doc

**To:** Joel Ball/AA/USEPA/US@EPA[]  
**Cc:** "Johnson, Stuart" [Stuart.Johnson@vw.com]  
**From:** "Berenz, Sebastian"  
**Sent:** Fri 2/17/2012 6:45:08 PM  
**Subject:** RE: Volkswagen and Audi IUVP status  
[mime.htm](#)  
[sebastian.berenz@vw.com](mailto:sebastian.berenz@vw.com)  
[sebastian.berenz@vw.com](mailto:sebastian.berenz@vw.com)

Hello Mr. Ball,

Like we recently discussed, I submitted the last vehicle today.

- MY2010 Low Mileage
- Test Group AVWXT03.6U76

· VIN: 

Ex. 6
-------

Now MY2006 and MY2010 is finished and all results submitted. We are working now on MY2007 and MY2011.

Thank you very much for opening up the system for us again.

Best regards

Sebastian Berenz

Manager In-Use Emission Compliance

Engineering Environmental Office

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E-Mail: sebastian.berenz@vw.com

<http://www.volkswagen.com>

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

From: Berenz, Sebastian  
Sent: Wednesday, February 15, 2012 2:56 PM  
To: Joel Ball (ball.joel@epa.gov)  
Cc: 'Lynn Sohacki'  
Subject: Volkswagen and Audi IUVP status

Hello Mr. Ball,

I just wanted to inform you about Volkswagen's and Audi's IUVP program and where we stand so far.

#### IUVP

- MY2006 – High Mileage Program
- 10 EVAP Families Tested
- 13 Test Groups Tested
- 6AD XV01.8342 – Audi A4 Cabriolet, 1.8L Turbo (170hp), InT2 – Bin8  
5 vehicles submitted (1 High Altitude)
- 6AD XV04.2345 – Audi S4/S4 Avant/S4 Cabriolet/Audi A6 quattro/VW Phaeton/Audi A8/A8L, 4.2L V8 (335hp),  
LEV I – LEV/InT2 – Bin 9  
5 vehicles submitted (1 High Altitude)
- 6AD XV02.0366 – Audi A3/VW GTI (A5)/VW Jetta (A5)/VW Passat / Passat Wagon (B6), 2.0L TFSI (200hp), LEV  
II – ULEV/Tier 2 – Bin 5  
6 vehicles submitted (1 High Altitude)
- 6AD XV02.0352 – Audi A4 / A4 quattro (B7), 2.0L TFSI (200hp), LEV II – ULEV/Tier 2 – Bin5

5 vehicles submitted (1 High Altitude)

- 6AD XV03.1364 – Audi A6 quattro/Audi A4 / A4 quattro (B7), 3.1L FSI (255hp), LEV I – LEV/InT2 – Bin 9  
5 vehicles submitted (1 High Altitude)
- 6AD XV03.1374 – Audi A6 quattro/Audi A4 / A4 quattro (B7), 3.1L FSI (255hp), LEV II – LEV/Tier 2 – Bin 5  
5 vehicles submitted (1 High Altitude)
- 6VW XT03.2275 – VW Touareg, 3.2L VR6 (240hp), LEV II – LEV/Tier 2 – Bin 5  
5 vehicles submitted (1 High Altitude)
- 6VW XV01.9236 – VW Golf (A4)/VW Jetta Wagon (A4)/VW New Beetle, 1.9L TDI (100hp), InT2 – Bin 10  
5 vehicles submitted (1 High Altitude)
- 6VW XV01.9238 – VW Jetta (A5), 1.9L TDI (100hp), InT2 – Bin 10  
5 vehicles submitted (1 High Altitude)
- 6VW XV02.5253 – VW New Beetle/New Beetle Convertible/VW Rabbit (A5)/VW Jetta (A6), 2.5L (150hp), LEV II – ULEV/Tier 2 – Bin 5  
5 vehicles submitted (1 High Altitude)
- 6VW XV02.5257 – VW New Beetle/New Beetle Convertible/VW Rabbit (A5)/VW Jetta (A5), 2.5L (150hp), LEV II – SULEV/Tier 2 – Bin 2  
5 vehicles submitted (1 High Altitude)
- 6VW XV03.6246 – VW Passat/Passat Wagon (B6), 3.6L VR6 FSI (280hp), LEV II – LEV/Tier 2 – Bin 5  
5 vehicles submitted (1 High Altitude)
- 6VW XV02.0223 – VW Golf (A4), 2.0L (115hp), Tier 2 – Bin 5  
5 vehicles submitted (1 High Altitude)
- Status: Testing finished, all vehicles submitted!
- MY2010 – Low Mileage Program
- 10 EVAP Families Tested
- 13 Test Groups Tested
- AAD XV02.03UA – Audi A3/A3 quat./VW Tiguan/VW GTI/Audi TT quat./TT Roadster quat./TTS Coupe/VW Jetta/VW Passat CC, 2.0L TFSI (265hp), LEV II – ULEV/Tier 2 – Bin 5  
2 vehicles submitted
- AAD XV02.03UB – Audi A4 quattro/A4 Avant quattro/A4 Cabriolet quattro/A4 CVT/A4 Cabriolet CVT/Audi A5 quattro, 2.0L TFSI – AVS (211hp), LEV II – ULEV/Tier 2 – Bin 5  
2 vehicles submitted
- AAD XJ03.23UC – Audi A4 quattro/A4 Cabriolet Quattro/Audi A5 quattro/Audi Q5/Audi A6 CVT, 3.2L FSI – AVS (265hp), LEV II – ULEV/Tier 2 – Bin 5  
2 vehicles submitted
- AAD XV02.03PA – Audi A3/VW Jetta/Jetta sportwagen/VW GTI, 2.0L TFSI (200hp), LEV II – SULEV (PZEV)/Tier 2 – Bin 3  
2 vehicles submitted

- AADXV03.03UF – Audi A6 quattro/A6 Avant Quattro/Audi S4/Audi S5 Cabriolet, 3.0L TFSI (300hp), LEV II – ULEV/Tier 2 – Bin 5  
2 vehicles submitted
- AVWXV02.0U5N – VW Jetta/Jetta Sportwagen/VW Golf (A6)/Audi A3, 2.0L TDI CR (140hp), LEV II – ULEV/Tier 2 – Bin 5  
3 vehicles submitted
- AVWXV02.5259 – VW Jetta (A5)/Jetta Sportwagen/VW Golf (A6), 2.5L (170hp), LEV II – SULEV(PZEV)/Tier 2 – Bin 5  
2 vehicles submitted
- AVWXV02.5U35 – VW Golf (A6)/VW Jetta (A5)/Jetta Sportwagen, 2.5L (170hp), Tier 2 – Bin 5  
2 vehicles submitted
- AVWXV02.03UA – VW Passat/Passat Wagon/Passat CC/VW Eos, 2.0L TFSI (200hp), Tier 2 – Bin5  
2 vehicles submitted
- AVWXV02.03PA – VW Passat/Passat Wagon/Passat CC, 2.0L TFSI (200hp), LEV II – SULEV (PZEV)/Tier 2 – Bin 3  
2 vehicles submitted
- AVWXV02.5257 – VW New Beetle/New Beetle Convertible, 2.5L (150hp), LEV II – SULEV(PZEV)/Tier 2 – Bin 3  
2 vehicles submitted
- AVWXV02.5253 – VW New Beetle/New Beetle Convertible, 2.5L (150hp), Tier 2 – Bin 5  
2 vehicles submitted
- AVWXT03.6U76 – Audi Q7/VW Touareg, 3.6L VR6 FSI (276hp/280hp), LEV II – ULEV/Tier 2 – Bin 5  
1 vehicle submitted
- Status: Testing finished. All vehicles submitted, except 1 from Test Group “AVWXT03.6U76”
- Problem MY 2010 Low Mileage Program
- MY2010 –Test Group AVWXT03.6U76 – We really had a hard time to procure the last vehicle with the mileage requirement. We finally got it in February 2012 and tested it also as an EVAP test vehicle. The Verify-System won't let me enter it, since it is already too late.
- How do you want me to proceed? Is there a way to open up Verify again?

Here is a just a quick status report on this year's IUVP program:

- MY2007 – High Mileage Program
- 9 EVAP Families to be tested

- 8 Test Groups to be tested
- 40% completed and submitted
  
- MY2011 – Low Mileage Program
- 9 EVAP Families to be tested
- 14 Test Groups to be tested
- 7% completed and submitted

Also we are involved in an EPA Surveillance program on test group 9AD XV03.23LC.

Please let me know how I should proceed on the one vehicle from MY2010 program which is already too late to enter it into Verify.

In case of any questions, please contact me.

Best regards.

Sebastian Berenz

Manager In-Use Emission Compliance

Engineering Environmental Office

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P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Hennard, Mike" [mike.hennard@vw.com]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]  
**Bcc:** []  
**From:** CN=Joel Ball/OU=AA/O=USEPA/C=US  
**Sent:** Wed 9/30/2009 6:26:14 PM  
**Subject:** RE: VERR 2009/08/07  
[mike.hennard@vw.com](mailto:mike.hennard@vw.com)

Thank you for the quick reply, I will look for the other reports you mentioned. I'll let you know if any more questions arise.

Best regards,

Joel Ball  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4238  
[ball.joel@epa.gov](mailto:ball.joel@epa.gov)

From: "Hennard, Mike" <mike.hennard@vw.com>  
To: Joel Ball/AA/USEPA/US@EPA  
Cc: "Kohnen, Christoph (VWGoA)" <christoph.kohnen@vw.com>  
Date: 09/30/2009 12:52 PM  
Subject: RE: VERR 2009/08/07

Joel:

I tried to contact you by telephone several times this week. Thus – I will send reply to your questions via e-mail.

- 1) VWGoA has submitted EDIR reports covering this topic for vehicles involved in glow plug replacement Service Action.
- 2) VWGoA issued an additional VERR regarding glow plug replacement for all vehicles involved on August 6, 2009.
- 3) VWGoA released this Service Action to assure customer satisfaction relating to glow plugs with the technical repair being updating all vehicles with ceramic type glow plugs to the later version steel glow plug .

If you require any additional information regarding this issue, please do not hesitate to call me to discuss.

Michael Hennard  
Manager - Emissions Compliance EEO

Volkswagen Group of America  
3800 Hamlin Road  
Auburn Hills, MI 48326



Telephone Number: 248 754 4202  
Fax: 248 754 4207  
mike.hennard@vw.com

From: Kohnen, Christoph (VWGoA)  
Sent: Monday, September 28, 2009 4:59 PM  
To: Hennard, Mike  
Subject: Fw: VERR 2009/08/07

Please let's discuss!!  
Dr. C. Kohnen  
Engineering and Environmental Office VWGoA

Send by Blackberry

From: Ball.Joel@epamail.epa.gov <Ball.Joel@epamail.epa.gov>  
To: Kohnen, Christoph (VWGoA)  
Sent: Mon Sep 28 16:31:39 2009  
Subject: VERR 2009/08/07

Hello Mr. Kohnen,

I received the mentioned VERR. I was a little surprised to see that VW is replacing the glow plugs as part of the repair procedure. Could you please explain the reason for replacing the glow plugs? Were there failures or defects found? If so, was there a defect report issued for these problems? Will there be a VERR issued to replace the glow plugs on automatic transmission vehicles?

Best Regards,

Joel Ball  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4238  
ball.joel@epa.gov

**To:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Peter, Juergen (EASZ/1)"  
[juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)"  
[Lothar.Rech@AUDI.DE]; Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de];  
Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; inc  
Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; Joel  
Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen  
Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A  
Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "[REDACTED]" (EXTERN:  
IAV)" [extern.[REDACTED]@volkswagen.de]; im Snyder/AA/USEPA/US@EPA; Joel  
Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen  
Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A  
Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "[REDACTED]" (EXTERN:  
IAV)" [extern.[REDACTED]@volkswagen.de]; oel Ball/AA/USEPA/US@EPA; Joel  
Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris  
Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William  
Ott/AA/USEPA/US@EPA; "[REDACTED]" (EXTERN: IAV)"  
[extern.[REDACTED]@volkswagen.de]; oel Dalton/AA/USEPA/US@EPA; Stephen  
Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A  
Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "[REDACTED]" (EXTERN:  
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Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A  
Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "[REDACTED]" (EXTERN:  
IAV)" [extern.[REDACTED]@volkswagen.de]; hris  
Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William  
Ott/AA/USEPA/US@EPA; "[REDACTED]" (EXTERN: IAV)"  
[extern.[REDACTED]@volkswagen.de]; aida Wright/AA/USEPA/US@EPA; William  
Ott/AA/USEPA/US@EPA; "[REDACTED]" (EXTERN: IAV)"  
[extern.[REDACTED]@volkswagen.de]; illiam Ott/AA/USEPA/US@EPA; "[REDACTED]"  
[REDACTED] (EXTERN: IAV)" [extern.[REDACTED]@volkswagen.de]; [REDACTED]  
(EXTERN: IAV)" [extern.[REDACTED]@volkswagen.de]; Stendel, Detlef (EASZ/1)"  
[detlef.stendel@volkswagen.de]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Wed 5/30/2012 12:55:33 PM  
**Subject:** Invitation: VW/EPA - MPI-FSI Fuel System (May 30 10:00 AM EDT in Web  
conference)

When: Wednesday, May 30, 2012 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).

Where: Web conference

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

.....

# Non-Responsive

Forgot your dial-in PIN?<<https://dialin.vw.com>> | First online  
meeting?<<http://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>>  
[!OC([1033])!]  
.....

To all:

Sorry about the confusion. We have rescheduled the conference call for 1000 Detroit time.

The slides have been distributed a couple of time. Please let me know if you need these.

Web conference details are shown above.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)<<mailto:leonard.kata@vw.com>>

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard" [Leonard.Kata@vw.com]; Krause, Norbert (VWoA)" [Norbert.Krause@vw.com]; om Ball/AA/USEPA/US@EPA; Tom Anderson/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Lynn Sohacki/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; "Johnson, Stuart" [Stuart.Johnson@vw.com]; om Anderson/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Lynn Sohacki/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; "Johnson, Stuart" [Stuart.Johnson@vw.com]; im Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Lynn Sohacki/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; "Johnson, Stuart" [Stuart.Johnson@vw.com]; oel Ball/AA/USEPA/US@EPA; Lynn Sohacki/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; "Johnson, Stuart" [Stuart.Johnson@vw.com]; ynn Sohacki/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; "Johnson, Stuart" [Stuart.Johnson@vw.com]; inc Wehrly/AA/USEPA/US@EPA; "Johnson, Stuart" [Stuart.Johnson@vw.com]; Johnson, Stuart" [Stuart.Johnson@vw.com]  
**From:** "Popa, Edward"  
**Sent:** Fri 2/13/2009 4:29:41 PM  
**Subject:** RE: 2007 IUVP - potential IUCP - Audi Q7 test group 7ADXT04.2358

Dave,

Thank you for taking the time to write the e-mail.  
Your decision to test three vehicles instead of two is acceptable for us.  
Procurement of the vehicles has been already initiated and we expect to have finished the testing of the three vehicles by end of April.  
The test results will be reported through the VERIFY-System.

If you have any questions please don't hesitate to contact me.  
Have a nice weekend,  
Edy

Edward-Fabian Popa  
Manager In-Use Emission Compliance

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-----Original Message-----

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Thursday, February 12, 2009 7:10 PM  
To: Popa, Edward

Cc: Kata, Leonard; Krause, Norbert (VWoA); Ball.Tom@epamail.epa.gov;  
Anderson.Tom@epamail.epa.gov; Snyder.Jim@epamail.epa.gov;  
Ball.Joel@epamail.epa.gov; Sohacki.Lynn@epamail.epa.gov;  
Wehrly.Linc@epamail.epa.gov  
Subject: Re: 2007 IUVP - potential IUCP - Audi Q7 test group  
7ADXT04.2358

Edy,

As we discussed today by telephone, both EPA and ARB approve your request to test additional IUVP vehicles under 40 CFR 1845-04 (b)(3)---provided VW/Audi test three additional IUVP vehicles (instead of two vehicles).

Please let us know if that is acceptable to you and when you plan to test the three vehicles.

Thanks

"Popa, Edward"  
<Edward.Popa@audi.com>  
To  
David Good/AA/USEPA/US@EPA  
02/05/2009 cc  
09:14 AM "Krause, Norbert (VWoA)"  
<Norbert.Krause@vw.com>, "Kata,  
Leonard" <Leonard.Kata@vw.com>  
Subject  
2007 IUVP - potential IUCP - Audi  
Q7 test group 7ADXT04.2358

Hello Dave,

Following our conversation on the phone from last week, I would like to ask you to take following into consideration when you decide about the number of vehicles to be tested for this MY2007 test group:

- 9,700 is the total vehicle volume sold in this test group. This low volume made it difficult to find many vehicles/customers willing to participate in the 2007 program, and will likely be the case for an

IUCP. Some of the difficulty procuring vehicles is a result of their being high end vehicles

- 1.307 g/mi is the average result for the mentioned test group - the regs require 1.30 g/mi. The small sample size and the difference between the results of the vehicles tested, raises a question about the significance of this result.

Considering these circumstances our suggestion is to test 2 more vehicles from CA. If those vehicles pass the test with a result in NMOG lower than 75% of the standard than we propose to stop procurement and testing, and ask EPA to accept the test group requirements for IUV as fulfilled.

In case the results are higher than 75% of the standard, we propose to procure and test another 2 vehicles. When all these 4 vehicles are below the emission standard, we request that EPA accept the test group requirements for IUV as being fulfilled.

As for the questions that came up concerning any reports about this test group either in California or Federal, since we did not find anything, my conclusion is that there are none.

However there are some technical bulletins which do not have a relevant influence on emissions. In this test group there are two vehicles the AUDI-Q7 and the VW-Touareg. The technical bulletins are listed after the car model:

#### AUDI-Q7

- #2015106/5 - 01 MIL on (DTC P310B and/or P129F) In case of MIL on and one of the above mentioned DTC, due to fuel intrusion into the low-pressure fuel pressure sensor (G410), a false signal may be sent to the controller, resulting in a reading that is out of tolerance.

- #2014753/5 - 01 MIL on, gasoline quality (DTC P0300 or P030x, lean condition DTCs) The use of contaminated gasoline may result in severe condition that will illuminate the MIL in conjunction with storage of above mentioned DTC's.

- #2017475/2 - 01 MIL/EPC on (P0087, P0088, P310B) In case MIL/EPC warning light comes on once with the DTC mentioned above logged in the memory no parts should be replaced and basic settings in MVB 103 to adapt fuel system have to be run.

- #2017843/3 - RVU - Fuel pressure sensor replacement (CL / 24M4) A malfunction of fuel pressure sensor G410 may cause an incorrect fuel pressure reading from the ECM. In this case the sensor has to be replaced with an improved one.

#### VW-Touareg:

- #2011168/4 - 01-07-54 - Engine Control Module (ECM), DO NOT Replace for These Diagnostic Trouble Codes (DTCs) ECM Modules were replaced unnecessary. This TB should be a diagnostic aid.

- #2014658/3 - 20-07-11 - Evaporative Emission (EVAP) system, Diagnostic Trouble Code Diagnosis A revised procedure is developed to test EVAP system without removing fuel cap.

Please let me know what your decision is regarding our suggestion.

Thank you for your support and understanding, Edy

Edward-Fabian Popa  
Manager In-Use Emission Compliance

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<http://www.audiusa.com>

-----Original Message-----

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Tuesday, January 27, 2009 12:50 PM  
To: Popa, Edward  
Cc: Kata, Leonard; Anderson.Tom@epamail.epa.gov;  
Ball.Tom@epamail.epa.gov; [Ex. 7]@arb.ca.gov  
Subject: 207 IUVP - potential IUCP - Audi Q7 test group 7ADXT04.2358

Eddie,

As we discussed, EPA believes that Audi Q7 test group 7ADXT04.2358 qualifies for the IUCP testing.

Attached are a spread sheet with the data plus a generic test plan letter to EPA (in case you should need it).

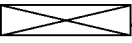
Please advise.

Thanks

(See attached file: potential Audi IUCP\_MY 2007 on Sep 15 08\_.xls)(See attached file: Generic IUCP Test Plan.109.doc)

**To:** "Popa, Edward" [Edward.Popa@audi.com]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Kata, Leonard" [Leonard.Kata@vw.com]; Krause, Norbert (VWoA)" [Norbert.Krause@vw.com]; Johnson, Stuart" [Stuart.Johnson@vw.com]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Tom Ball/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Lynn Sohacki/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Ball/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Lynn Sohacki/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Lynn Sohacki/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Lynn Sohacki/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Lynn Sohacki/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 4/17/2009 8:53:32 PM  
**Subject:** Re: IUVP-MY2007 Additional Testing for Test Group 7ADXT04.2358 - EPA & CARB agree that no additional low mileage testing is necessary  
<mailto:edward.popa@audi.com>  
<http://www.vw.com>  
<http://www.audiusa.com>

Edy,

I talked to  at CARB and EPA and ARB agree that no further IUVP low mileage testing is necessary for vehicles in this test group (and that with the additional test vehicles, the test group doesn't qualify for IUCP testing).

Thanks for testing the vehicles so promptly and entering the data in Verify.

As a reminder:

In the future when a test group qualifies for IUCP testing, the regulations require VW/Audi to notify EPA and ARB, to send EPA/ARB a test plan for approval prior to beginning the IUCP testing, to begin the IUCP testing within 3 months of the time when the IUVP testing is completed for the test group and to finish IUCP testing within 7 months of the time when the IUVP testing is completed for the test group; ref 40 CFR 86.1846-01(g) and (i).

Regards

IUVP-MY2007 Additional Testing for Test Group 7ADXT04.2358

Popa, Edward to: David Good 04/01/2009 02:10 PM

Cc: "Krause, Norbert (VWoA)", "Johnson, Stuart", "Kata, Leonard", "Kohnen, Christoph (VWGoA)"



Hello Dave,

The third vehicle for the test group 7ADXT04.2358 has been successfully tested.  
Results have been reported through the Verify-System.

The VIN# of the third vehicle is:

**Ex. 6**

With the completion of this testing we have satisfied the agreement to test three additional vehicles for the above mentioned test group.

I would appreciate your confirmation of receipt of all test data, as well as completion of the IUVP-Testing-Requirements for this test group.

Thank for your support,  
Edy

Edward-Fabian Popa  
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**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;healy.stephen@epa.gov;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
**Ball/OU=AA/O=USEPA/C=US@EPA;** Ex. 7 healy.stephen@epa.gov;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
**Ball/OU=AA/O=USEPA/C=US@EPA;** Ex. 7 N=Jim  
**Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel**  
**Ball/OU=AA/O=USEPA/C=US@EPA;** Ex. 7 N=Joel  
**Ball/OU=AA/O=USEPA/C=US@EPA;** Ex. 7  
**Cc:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/21/2009 8:10:13 PM  
**Subject:** VW - Hybrid & MSAT issues

**To:** leonard.kata@vw.com[]  
**Cc:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; uergen.peter@volkswagen.de;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; othar.Rech@AUDI.DE;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/24/2009 1:28:53 PM  
**Subject:** Re: IRS tax credit for hybrids, diesels, etc  
MSAT Vehicle Provisions Summary FINAL RULE.508.pdf

Len,

Here's some additional information on the IRS tax credit for hybrids, diesels, etc. I'm sure you know how to apply for the tax credit (since VW diesel vehicles are entitled to a credit) but just in case.....

I would recommend starting with the two following web pages for additional information, guidance, links to forms, list of eligible vehicles, etc:

<http://www.irs.gov/newsroom/article/0,,id=157632,00.html>

<http://www.irs.gov/newsroom/article/0,,id=157557,00.html>

Beyond that, John could try contacting Dan Orsini in the IRS Detroit Office at 313-234-2182. He was the program contact years ago but I haven't been actively involved in this in quite some time so I can't guarantee that Dan is still there or the point of contact.

Hope that helps.

**From:** David Good/AA/USEPA/US  
**To:** leonard.kata@vw.com, Lothar.Rech@AUDI.DE, juergen.peter@volkswagen.de

Cc: Linc Wehrly/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Jim Snyder/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA  
Date: 09/24/2009 08:39 AM  
Subject: MSAT - phase-in of cold NMHC standards

Len & all,

Attached is my summary of the MSAT rule. This should help answer your questions about the phase-in requirements of the cold NMHC standards.

[I think this summary is accurate reflection of the regulations, but of course, the regulations take precedent if this summary doesn't agree with the regulations.]

Please resend the handouts as they didn't come thru when you accepted the meeting in Lotus Notes.

Dave

**FINAL RULE:  
CONTROL OF HAZARDOUS AIR POLLUTANTS  
FROM MOBILE SOURCES**

February, 2007, revised 12/20/07, 5/13/08

**Summary of Vehicle-Related Provisions**

# DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

## 1. Cold Temperature Exhaust Emissions

### Standard and Phase-in

Weight Category (GVWR)	Cert./In-Use Fleet Avg NMHC (g/mi)	Phase-In: Percentage of Vehicles by Model Year							
		2008	2009	2010	2011	2012	2013	2014	2015
LDVs & LLDTs ( $\leq 6,000$ lbs)	0.3	Opt.	Opt.	25	50	75	100	100	100
HLDTs ( $>6,000$ - $8,500$ lbs) & MDPVs ( $>8,500$ - $10,000$ lbs)	0.5	NA	NA	Opt.	Opt.	25	50	75	100

Standard: 86.1811-09(a)(5), 86.1811-10(g)(2), 86.1864-10(a) and (e).

Phase-in: 86.1811-10(g)(2)(iii) and (g)(3), 86.1864-10(f).

### Alternate Phase-In

Weight Category	Alternate Phase-In Equation
LDV/LLDT	$(6 \times \text{API}_{2008}) + (5 \times \text{API}_{2009}) + (4 \times \text{API}_{2010}) + (3 \times \text{API}_{2011}) + (2 \times \text{API}_{2012}) + (1 \times \text{API}_{2013}) \geq 500\%$ , sum of first three products $\geq 100\%$ (i.e., “early year provision”)
HLDT/MDPV	$(6 \times \text{API}_{2010}) + (5 \times \text{API}_{2011}) + (4 \times \text{API}_{2012}) + (3 \times \text{API}_{2013}) + (2 \times \text{API}_{2014}) + (1 \times \text{API}_{2015}) \geq 500\%$ , sum of first three products $\geq 100\%$ (i.e., “early year provision”) -or- $(6 \times \text{API}_{2010}) + (5 \times \text{API}_{2011}) + (4 \times \text{API}_{2012}) + (3 \times \text{API}_{2013}) + (2 \times \text{API}_{2014}) + (1 \times \text{API}_{2015}) \geq 600\%$ , no early year provision

Alternative Phase-In: 86.1811-10(g)(4).

API = anticipated phase-in percentage for the referenced model year.

100% phase-in required by MY 2013 for LDV/LLDTs, MY 2015 for HLDT/MDPVs.

### Interim In-use Standard = Test Group FEL + 0.1 g/mi

Model Year of Introduction	2008	2009	2010	2011	2012	2013	2014	2015
LDV/LLDT:	2008	2009	2010	2011	2012	2013		
Model year for which interim in-use standard applies	2009	2010	2011	2012	2013	2014		
	2010	2011	2012	2013	2014			
	2011	2012	2013					
HLDT/MDPV:			2010	2011	2012	2013	2014	2015
Model year for which interim in-use standard applies			2011	2012	2013	2014	2015	2016
			2012	2013	2014	2015	2016	
			2013	2014	2015			

Interim In-use Standard: 86.1811-10(u), 86.1864-10(i).

Otherwise the in-use standard is the certification standard.

Standards apply for purposes of in-use testing only and do not apply to certification or Selective Enforcement Auditing.

### Calculating Standard

Fleet-Average NMHC exhaust emissions	=	$\frac{(N \times \text{FEL})}{\text{Total \# vehicles sold}}$
---	---	---

Method: 86.1811-10(g)(2)(ii), 86.1864-10(m).

Computed at end of model year using actual sales.

N = The number of LDVs and LLDTs, or HLDTs and MDPVs, sold within the applicable FEL, based on vehicles counted to the point of first sale.

Total # vehicles sold = LDV + LLDTs, or HLDT + MDPVs

# DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

## STANDARD

- Testing [86.1864-10(k)]: Cold carbon monoxide (CO) 20°F FTP test at either durability or test group level; alternative testing procedures may be used provided cold temperature NMHC emissions do not decrease; testing must be on a loaded vehicle weight (LVW) basis.
- Family Emission Limit (FEL) [86.1864-10(m)]: Mfr assigns FEL to all vehicles in durability or test group. One-decimal place FEL is standard for group for full useful life. No cap on FEL.
- Certification, Compliance, and Enforcement: 86.1811-10(g)(2)(iv); 86.1848-10; 86.1864-10(n) and (o).
- Full useful life [86.1805-04(g), 86.1811-10(g), 86.1864-10(b)]:
  - LDV/LLDT: 10 yrs or 120,000 miles, whichever comes first.
  - HLDT/MDPV: 11 yrs or 120,000 miles, whichever comes first.
- Intermediate Useful Life Standard [86.1811-10(g)(2)]: None.

## DURABILITY AND VEHICLE DETERMINATION

- Durability Demonstration [86.1823-01(a)(3)(i)(C), 86.1864-10(j)]: A separate DF may be calculated exclusively using cold temperature NMHC test data to determine compliance with cold temperature NMHC emission standards. For determining compliance with full useful life cold NMHC emission standards, the 68-86 degree F 120,000 mile full useful life NMOG DF may be used.
- Test Group Determination [86.1827-01(a)(5)]: To be in the same test group, vehicles must be subject to the same emission standards (or FEL in the case of cold temperature NMHC standards), except that a mfr may request to group vehicles into the same test group as vehicles subject to more stringent standards, so long as all the vehicles within the test group are certified to the most stringent standards applicable to any vehicle within that test group.
- Emission Data Vehicle Selection [86.1864-10(l)]: For cold temperature NMHC exhaust emission compliance for each durability group, the vehicle expected to emit the highest NMHC emissions at 20 degrees F on candidate in-use vehicles shall be selected from the test vehicles. When the expected worst-case cold temperature NMHC vehicle is also the expected worst-case cold CO vehicle, then cold testing is required only for that vehicle; otherwise, testing is required for both the worst-case cold CO vehicle and the worst-case cold temperature NMHC vehicle [86.1828-10(g)]. EDV in each durability group shall be tested in accordance with the test procedures in subpart C of this part or with alternative procedures requested by the mfr and approved in advance by the Administrator [86.1829-01(b)(3)].

## PHASE-IN COMPLIANCE

- Regular Phase-in Compliance [86.1811-10(g)(5) and (6)]: Mfrs must show compliance with required phase-in schedules by submitting information in Part I applications as required by §86.1844(d)(13). Sales percentages for determining phase-in compliance based upon projected 50-State sales; mfr may petition to allow actual volume produced to be used in lieu of projected sales.
- Alternate Phase-in Compliance [86.1811-10(g)(5)(ii)]: Mfr shows in certification application for the first year in which it intends to use such a schedule, and in each succeeding year during the phase-in, the intended phase-in percentages for that model year and the remaining phase-in years along with the intended final sum of those percentages. In its year end annual reports, mfr must include sufficient information so that the Administrator can verify compliance with the alternative phase-in schedule.

## CREDIT PROGRAM

- Early Credits [86.1864-10(o)(5), 86.1811-10(g)(2)(iv)]: Mfrs may certify LDV/LLDTs for MY 2008-2009 in order to bank credits for use in MY 2010 and later; mfrs may certify HLDT/MDPVs for MY 2010-2011 in order to bank credits for use in MY 2012 and later; early HLDT/MDPV credits may not be applied to LDV/LLDTs before MY 2010; early LDV/LLDT credits may not be applied to HLDT/MDPV before MY 2012.
- Credit Use [86.1864-10(o)(7)]: Credits may be banked and used in a future MY in which a mfr's average exceeds standard, exchanged between the LDV/LLDT and HLDT/MDPV fleets of a given mfr, traded to another mfr; mfr must apply available credits to offset any deficits before trading or carrying over; credits not be permitted to address Selective Enforcement Auditing or in-use testing failures. Vehicles below the standard, and either introduced before phase-in begins or in excess of required phase-in percentage, may both generate credits and offset phase-in requirements.
- Credit Life [86.1864-10(o)(6)]: Credits are not subject to discount or expiration date except as required under the deficit carryforward provisions.

## DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

- Generating Credits [86.1864-10(o) and (o)(4)]: Credits may be generated prior, during, and after the phase-in period. Credits are earned on the last day of the model year using equation, rounded to the nearest tenth: Credits or Debits = (Cold Temperature NMHC Standard – Mfr's Sales-Weighted Fleet Avg Cold NMHC Emissions) × (Total Number of Vehicles Sold); where Total Number of Vehicles Sold = Total 50-State sales based on the point of first sale.
- Compliance [86.1864-10(o)(3)]: The averaging, banking and trading program shall be enforced through the certificate of conformity.
- Debits [86.1864-10(o)(8)]: mfr may carry deficit forward into the next model year only occur after mfr uses banked credits. At the end of that next model year, the deficit must be covered with an appropriate number of credits that the mfr generates or purchases. Any remaining deficit shall be subject to an enforcement action. Mfrs not permitted to run a deficit for two consecutive years

### APPLICABILITY

- Fuel: gasoline-fueled LDV/LLDTs and HLDT/MDPVs; testing with other fuels (e.g., E85, diesel) not required; multi-fuel, bi-fuel or dual-fuel vehicles must comply with requirements using gasoline only [86.1811-10(g)(2)]. For any AECD uniquely used on multi-fuel vehicles when operated on fuels other than gasoline, EPA may request engineering emission data to quantify any emission impact and validity of the AECD [86.1844-01(d)(11), 86.1864-10(k)(3)].
- Altitude: Standards only apply at low altitude [86.1810-09(f)(1)], [86.1864-10(c)]; testing at high altitude not required; mfrs shall submit an engineering evaluation indicating that common calibration approaches are utilized at high altitudes. Any deviation from low altitude emission control practices shall be included in the auxiliary emission control device (AECD) descriptions submitted at certification. Any AECD specific to high altitude shall require engineering emission data for EPA evaluation to quantify any emission impact and validity of the AECD [86.1810-09(f)(2), 86.1844-01(d)(11), 86.1864-10(k)(3)].
- Conversion and ICIs [86.1864-10(a)]: Applies to aftermarket conversion systems as defined in 40 CFR 85.502, including conversion of MDPVs; vehicles imported by ICIs as defined in 40CFR 85.1502.



## DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

### 2. Evaporative Emissions

#### Evaporative Emission Standards (Grams of hydrocarbons per test) [86.1811-09(e)(1)]

Vehicle Category	Model Year	3-Day Diurnal Plus Hot Soak	Supplemental 2-Day Diurnal Plus Hot Soak
LDVs	2009	0.50	0.65
LLDTs	2009	0.65	0.85
HLDTs	2010	0.90	1.15
MDPVs	2010	1.00	1.25

#### STANDARD

- Standards equivalent to California's LEV II standards; would represent about 20-50% reduction (depending on vehicle weight class and type of test) in diurnal plus hot soak standards from the Tier 2 standards that will be in effect in the years immediately preceding the implementation of proposed standards.
- Standards apply both for certification and in-use [86.1811-09(a)(5), (e), (e)(1)].
- Useful life remains unchanged from Tier 2 evaporative requirements; (10 years/120,000 miles for LDVs, LLDTs and 11 years/120,000 miles for HLDTs, MDPVs; optionally 15 years/150,000 miles); ref. 86.1805-04(a) and (b).
- Interim In-use: Tier 2 evaporative emissions standards apply in-use for only the first three model years after an evaporative family is first certified:
  - LDV/LLDTs certified prior to the 2012 model year [86.1811-09(t)(1)].
  - HLDTs and MDPVs certified prior to the 2013 model year [86.1811-09(t)(2)].
- Multi-Fuel Vehicles: Standards apply to the non-gasoline portion of multi-fueled vehicles beginning in 2012 with a 3-year phase in of 30/60/100% based on a combined fleet of LDVs/LLDTs and HLDTs/MDPVs [86.1811-09(e)(1)(ii) and (iii)].

#### TIMING

- LDV/LLDT: 100% compliance in model year 2009; no phase-in period [86.1811-09(e)(1)].
- HLDT/MDPV: 100% compliance in model year 2010; no phase-in period [86.1811-09(e)(1)].

#### DIFFERENCES IN TIER 2 AND LEV II EVAPORATIVE EMISSION TEST REQUIREMENTS

Test Requirement	EPA Tier 2	California LEV II
Fuel volatility (Reid Vapor Pressure in psi):	9	7
Diurnal temperature cycle (degrees F):	72 to 96	65 to 105
Running loss test temperature (degrees F):	95	105

- Test Procedure & Test Fuel:** For low altitude 2-day & 3-day evaporative tests, manufacturers may use either the Federal test procedure (with 9RVP Indolene Tier 2 test fuel) or the California test procedure (7 RVP Phase II test fuel); ref. 86.1811-09(e)(7).
- Durability:** Tier 2 evaporative program requires mfrs to certify the durability of their evaporative emission systems using a fuel containing the maximum allowable concentration of alcohols (highest alcohol level allowed by EPA in the fuel on which the vehicle is intended to operate, i.e., a "worst case" test fuel). Under current requirements, this fuel would be about 10 percent ethanol by volume. (We are retaining these Tier 2 durability requirements for the proposed evaporative emissions program.) California does not require this provision.
- Hardware:** To compensate for the increased vulnerability of system components to alcohol fuel, mfrs have indicated that they will produce a more durable evaporative emission system than the Tier 2 numerical standards would imply, using the same low permeability hoses and low loss connections and seals planned for California LEV II vehicles.

#### APPLICABILITY

- Applies to gasoline-fueled, dedicated natural gas-fueled, dedicated liquefied petroleum gas-fueled, dedicated ethanol-fueled, dedicated methanol-fueled and multi-fueled vehicles. [86.1811-09(e)(1)].

## DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

### 3. Provisions for Small Volume Mfrs (inc. ICIs and AFVCs)

#### PROVISIONS

- Certification procedures. Covered in §86.1838-01 [86.1864-10(d)].
- Categories of businesses covered: small volume mfrs (SVMs), independent commercial importers (ICIs), and alternative fuel vehicle converters. For certification purposes, SVMs include ICIs and alternative fuel vehicle converters since they sell less than 15,000 vehicles per year.
- Phase-in flexibilities: Provided in §86.1811-04(k)(5)[86.1864-10(g)].
- Hardship provisions: SVMs may apply for up to an additional 2 years to meet the 100% phase-in requirements for cold NMHC [86.1811-04(q)(1)(viii) and (ix)] and the delayed requirement for evaporative emissions [86.1811-04(q)(1)(vi) and (vii), 86.1864-10(h)].

#### TIMING

- Cold temperature exhaust standards:
  - LDV/LLDTs: Exempt from phase-in requirements for MY 2010, 2011, and 2012, but must comply with the 100% requirement for MY 2013 and later [86.1811-04(k)(5)(vi)].
  - HLDT/MDPVs: Exempt from phase-in requirements for MY 2012, 2013, and 2014, but must comply with the 100% requirement for MY 2015 and later [86.1811-04(k)(5)(vii)]
- Evaporative emission standards:
  - LDV/LLDTs: Exempt for model years 2009 and 2010, but must comply with the Tier 2 evaporative emission standards for model years 2009 and 2010 [86.1811-04(k)(5)(iv)]. 100% compliance by model year 2011; no phase-in period.
  - HLDT/MDPVs: Exempt for model years 2010 and 2011, but must comply with the Tier 2 evaporative emission standards for model years 2010 and 2011 [86.1811-04(k)(5)(v)]. 100% compliance by model year 2012; no phase-in period.

#### SPECIAL PROVISIONS FOR INDEPENDENT COMMERCIAL IMPORTERS (ICIs)

- Timing/Phase-in: ICIs, which qualify as SVMs, are exempt from the cold temperature NMHC phase-in intermediate percentage requirements [85.1515 (c)(8)(iii)]. Nonconforming LDV/LLDTs originally manufactured in OP years 2010 and later must meet the cold temperature NMHC emission standards [85.1515(c)(8)(i)]. Nonconforming HLDTs and MDPVs originally manufactured in OP years 2012 and later must meet the cold temperature NMHC emission standards [85.1515(c)(8)(ii)].
- Evaporative Emissions:
  - Nonconforming LDV/LLDTs originally manufactured in OP years 2009 and later must meet the evaporative emission standards. However, LDV/LLDTs originally manufactured in OP years 2009 and 2010 and imported by ICIs who qualify as small SVMs are exempt from the LDV/LLDT evaporative emission standards, but must comply with the Tier 2 evaporative emission standards [85.1515 (c)(2)(vii)].
  - Nonconforming HLDTs and MDPVs originally manufactured in OP years 2010 and later must meet the evaporative emission standards. However, HLDTs and MDPVs originally manufactured in OP years 2010 and 2011 and imported by ICIs, who qualify as SVMs, are exempt from the HLDTs and MDPVs evaporative emission standards, but must comply with the Tier 2 evaporative emission standards [85.1515 (c)(2)(viii)].
- Credits, Averaging, Banking, and Trading:
  - ICIs may meet an FEL below the standards and bank or sell credits. An ICI may not meet a higher FEL than the fleet average standards, unless it demonstrates that it has obtained appropriate and sufficient NMHC credits. [85.1515 (c)(8)(iv)]
  - Where an ICI desires to obtain a certificate using a higher FEL, but does not have sufficient credits, the Administrator may issue such certificate if the ICI has also obtained a certificate of conformity for vehicles certified using a FEL lower than that required. The ICI may then import vehicles to the higher FEL only to the extent that it has generated sufficient credits from vehicles certified to a FEL lower than the fleet average standard during the same model year. [85.1515 (c)(8)(v)]
  - ICIs using FELs higher than the standards must monitor their imports so that they do not import more vehicles certified to such FELs than their available credits can cover. ICIs must not have a credit deficit at the end of a model year and are not permitted to use the deficit carryforward provisions. [85.1515 (c)(8)(vi)]

**To:** Joel Ball/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA[]  
**Cc:** "Johnson, Stuart" [Stuart.Johnson@vw.com]; Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]  
**From:** "Popa, Edward"  
**Sent:** Tue 9/29/2009 5:59:03 PM  
**Subject:** 2008, 2009 VW/Audi IUVP Test plan  
[2005-09 IUVP Test Plan.308.doc](#)

Hello Dave, Hello Joel,

Attached is the plan for the vehicles in MY2008 and MY2009.  
I also put the right number of vehicles for MY2005 in the spread sheet.

If you have any other questions please let me know.  
And it would be nice to have the snapshot of the IUVP-Data from CEFIS/VERIFY if possible.

Thank you and have a nice week,  
Edy

Edward-Fabian Popa  
Manager In-Use Emission Compliance

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3800 Hamlin Road  
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Tel. +1 248 754 4211  
Mobile: +1 248 881 4095  
Fax: +1 248 754 4207  
<mailto:edward.popa@audi.com>  
<http://www.vw.com>  
<http://www.audiusa.com>

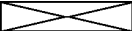
-----Original Message-----

**From:** Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
**Sent:** Thursday, September 24, 2009 1:52 PM  
**To:** Popa, Edward  
**Cc:** Ball.Joel@epamail.epa.gov; Johnson, Stuart  
**Subject:** 2008, 2009 VW/Audi IUVP Test plan

Edy,

re: 2008, 2009 IUVP Test plan

When you get a chance, please send Joel Ball and me the number of IUVP vehicles VW/Audi will test for the 2008 and 2009 model years. Please use the attached example format and change the numbers accordingly.

Joel Ball is going to take the lead for EPA on the IUVP program. You can email or call him (and  of CARB) with any IUVP questions you have about recruiting, testing, etc. If Joel is out of the office, I'll serve as his back-up, so feel free to contact me.

Joel will try to send you a snapshot of the IUVP data which we show in CFEIS and Verify so you can check your records.

Thanks

(See attached file: 2005-09 IUVP Test Plan.308.doc)

## IUVP Example Test Plan

Manufacturer Volkswagen Group of America

Date 09/29/2009

### 2005, 2008 & 2009 MY IUVP Testing Requirements

Model Year & IUVP program	FTP Tests	US06 Tests	2-Day EVAP Tests	ORVR Tests	Estimated Completion Date
2004 high mileage					8/1/09
2005 high mileage	68	68	11	11	8/1/10
2006 high mileage					8/1/11
2007 high mileage					8/1/12
2008 high mileage					8/1/13
2009 high mileage					8/1/14
2008 low mileage	24	24	10	10	8/1/09
2009 low mileage	27	27	10	10	8/1/10

c://1iuvp/2003-07 iuvp test plan.308.doc

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Antonio Fernandez/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;Lothar.Rech@AUDI.DE[]; N=Antonio Fernandez/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;Lothar.Rech@AUDI.DE[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;Lothar.Rech@AUDI.DE[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;Lothar.Rech@AUDI.DE[]; N=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;Lothar.Rech@AUDI.DE[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;Lothar.Rech@AUDI.DE[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;juergen.peter@volkswagen.de;Lothar.Rech@AUDI.DE[]; uergen.peter@volkswagen.de;Lothar.Rech@AUDI.DE[]; othar.Rech@AUDI.DE[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 10/7/2009 1:54:28 PM  
**Subject:** followup to 9/24/09 EPA/VW meeting - phase-in of cold NMHC standards

Len,

EPA reviewed the cold NMHC calculations provided on slides 3-9 of your presentation in our 9/24/09 meeting at EPA.

We concur with the credit/debit calculations and method of determining compliance with cold NMHC emission standards outlined in those slides.

Regards

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Date: 09/24/2009 09:54 AM  
Subject: RE: MSAT - phase-in of cold NMHC standards

Hi Dave:

Unfortunately, the sum of the files is quite large so I will send the

information in parts. For the most part, this is background information. This is e-mail #1. I have added a document on Fuel Fired Heaters and ask that the information on Bench Test procedures (basically, from our March meeting) be considered for acceptance.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
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Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

-----Original Message-----

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Thursday, September 24, 2009 8:40 AM  
To: Kata, Leonard; Rech, Lothar (I/EA-523); Peter, Juergen (EASZ/1)  
Cc: Wehrly.Linc@epamail.epa.gov; Nevers.Chris@epamail.epa.gov;  
Healy.Stephen@epamail.epa.gov; Ball.Joel@epamail.epa.gov;  
Snyder.Jim@epamail.epa.gov; Anderson.Tom@epamail.epa.gov  
Subject: MSAT - phase-in of cold NMHC standards

Len & all,

Attached is my summary of the MSAT rule. This should help answer your questions about the phase-in requirements of the cold NMHC standards.

[I think this summary is accurate reflection of the regulations, but of course, the regulations take precedent if this summary doesn't agree with the regulations.]

Please resend the handouts as they didn't come thru when you accepted the meeting in Lotus Notes.

Dave

(See attached file: MSAT Vehicle Provisions Summary FINAL RULE.508.pdf)  
[attachment "Meeting Report.pdf" deleted by David Good/AA/USEPA/US]



**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 2/2/2010 10:13:32 PM  
**Subject:** Meeting with Volkswagen/ Audi: new tank concept for for SCR systems

Our colleagues from Audi will be in the U.S. during the first week in March 2010 to participate in a number of meetings. They wish to meet with EPA Staff.

The discussion topics include:

Presentation and request for approval of a new tank concept for for SCR systems in various Audi models equipped with the 3.0L TDI diesel engine.  
Diesel Exhaust Fluid distribution infrastructure.

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=Maria Peralta/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 5/17/2010 2:41:52 PM  
**Subject:** Road Load Determination Meeting w/ VW

Hello Linc and Jim:

As we have discussed, Volkswagen representatives are scheduled to meet with you on Wednesday, June 2, 2010 at 09:30 to discuss road load determination and the responses to the questions provided in your e-mail of April 2, 2010. Our representatives are preparing a formal presentation and formulating the responses to the questionnaire.

I had previously stated that one or two people from our local office and another two or three from Germany would attend. Considering the travel time and distance for our German colleagues, I would like to know whether it would be acceptable to have them join the meeting by telephone. I would still attend in person and provide the presentation materials, with the technical experts engaged in the dialogue. I am able to set up a conference call-in number and access code.

I would appreciate your thoughts on this. Please recognize that this request should not be construed as minimizing the importance of this meeting. We look forward to a detailed discussion.

Best regards,  
Len

—

**To:** "Popa, Edward" [Edward.Popa@audi.com]; oel Ball/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA[]  
**Cc:** "Johnson, Stuart" [Stuart.Johnson@vw.com]  
**From:** [Ex. 7]@ARB"  
**Sent:** Tue 5/25/2010 2:33:44 PM  
**Subject:** RE: VWGoA - Useful Life Vehicles for MY2005  
<mailto:edward.popa@audi.com>  
<http://www.vw.com>  
<http://www.audiusa.com>

Edy,

When are these test groups required to be completed? What procurement area are you using for the high mileage vehicles?

**Ex. 7**

California Environmental Protection Agency

Air Resources Board

In-Use Compliance Section

**Ex. 7**

From: Popa, Edward [mailto:Edward.Popa@audi.com]  
Sent: Tuesday, May 25, 2010 7:02 AM  
To: Ball.Joel@epamail.epa.gov; Good.David@epamail.epa.gov; [Ex. 7]@ARB  
Cc: Johnson, Stuart  
Subject: VWGoA - Useful Life Vehicles for MY2005

Hello Gentlemen,

We have had difficulties to find the full useful life vehicles for three test groups in MY2005.

For the procurement of the vehicles is our contractor California-Environmental-Engineering (CEE) responsible.

The following describes the actual situation of the test groups involved.

- Test-Group 5VWXT03.2225

There are 4 vehicles to be tested in this group, 2 vehicles warm and 2 cold weather.

So far we have tested following vehicles:

- VIN# **Ex. 6** from CA with a mileage of 55,470 miles\_\_Vehicle passed all Standards
- VIN# **Ex. 6** from MI with a mileage of 54,342 miles\_\_Vehicle passed all Standards
- VIN# **Ex. 6** from CO with a mileage of 62,000 miles\_\_Vehicle passed all Standards

In order to get the 4th vehicle with a odometer over 90,000 miles for the full useful life test, we already have sent a 4th mailing out without getting a successful respond.

The highest mileage that we have on a vehicle available for this test group at the moment is 81,000 miles.

- Test-Group 5VWXV02.0223

There are 4 vehicles to be tested in this group.

So far we have tested following vehicles:

- VIN# **Ex. 6** from CA with a mileage of 61,565 miles\_\_Vehicle passed all Standards
- VIN# **Ex. 6** from MI with a mileage of 52,973 miles\_\_Vehicle passed all Standards
- VIN# **Ex. 6** from CO with a mileage of 52,000 miles\_\_Vehicle passed all Standards

In order to get the 4th vehicle with a odometer over 90,000 miles for the full useful life test, we already have sent a 3rd mailing out without getting a successful respond.

The highest mileage that we have on a vehicle available for this test group at the moment is 73,200 miles.

- Test-Group 5VWXV02.0224

There are 4 vehicles to be tested in this group.

So far we have tested following vehicles:

- VIN# **Ex. 6** from CA with a mileage of 53,697 miles\_\_Vehicle passed all Standards
- VIN# **Ex. 6** from MI with a mileage of 50,109 miles\_\_Vehicle passed all Standards
- VIN# **Ex. 6** from CO with a mileage of 60,000 miles\_\_Vehicle passed all Standards

In order to get the 4th vehicle with a odometer over 90,000 miles for the full useful life test, we already have sent a 4th mailing out without getting a successful respond.

The highest mileage that we have on a vehicle available for this test group at the moment is 61,000 miles.

At this moment we would ask you to accept for the above mentioned test groups for the full useful life tests the vehicles with the highest mileage available at present.

Please let me know as soon as you can what your decision/advise is concerning this matter. If I don't hear from you otherwise by beginning of next week I'll assume that you agree with me procuring and testing the vehicles with the mileage mentioned above.

Thank you for your understanding and support,

Edy

Edward-Fabian Popa  
Manager In-Use Emission Compliance

Volkswagen Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Road  
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Tel. +1 248 754 4211  
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<http://www.audiusa.com>

**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Maria Peralta/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Maria Peralta/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Maria Peralta/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Maria Peralta/AA/USEPA/US@EPA[]; artin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Maria Peralta/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Maria Peralta/AA/USEPA/US@EPA[]; om Anderson/AA/USEPA/US@EPA;Maria Peralta/AA/USEPA/US@EPA[]; aria Peralta/AA/USEPA/US@EPA[]

**From:** "Kata, Leonard"

**Sent:** Tue 6/1/2010 7:50:38 PM

**Subject:** RE: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in AA-C126/AA-OTAQ-OFFICE@EPA)

[EPA Road Load Determination Meeting.pdf](#)

[leonard.kata@vw.com](mailto:leonard.kata@vw.com)

To all:

Attached is an advance copy of the presentation that VW will discuss tomorrow during our meeting on road load determination. Several participants will join by telephone from Germany, so it would be appreciated if a speaker telephone is available. The call-in details are provided below.

Dr. Christoph Kohnen and I will attend the meeting in person. We expect the following participants, representing Volkswagen and Audi to join by telephone:

Mr. Kai Behlau

Mr. Stuart Johnson

Mr. Andreas Kopp

Mr. Juergen Peter

Mr. Alexander Riedel

Dr. Klaus Rohde-Brandenburger

Dr. Holger Tiedt

Audio Conference Information:

Bridge Name: vwoaa500

Participant Code: Ex. 6

Bridge Dial-in Number: Ex. 6

Best regards,

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

<<EPA Road Load Determination Meeting.pdf>>

-----Original Appointment-----

From: Jim Snyder/AA/USEPA/US

Sent: Monday, May 17, 2010 10:42 AM

To: Jim Snyder/AA/USEPA/US; Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov; Kata, Leonard; Wehrly.Linc@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov; Anderson.Tom@epamail.epa.gov

Cc: Peralta.Maria@epamail.epa.gov

Subject: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in AA-C126/AA-OTAQ-OFFICE@EPA)

When: Wednesday, June 02, 2010 9:30 AM-11:30 AM (GMT-05:00) Eastern Time (US & Canada).

Where: C126

Invitation: Road Load Determination Meeting w/ VW

06/02/2010 -

Chair:

Jim Snyder/AA/USEPA/US

Sent By:

Snyder.Jim@epamail.epa.gov

Location:

C126

Rooms:

AA-C126/AA-OTAQ-OFFICE@EPA

Snyder.Jim@epamail.epa.gov

Jim Snyder has invited you to a meeting. You have not yet responded.

Required:

Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Leonard.Kata@vw.com, Linc Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA

Optional:

Maria Peralta/AA/USEPA/US@EPA

Description

Hello Linc and Jim:

As we have discussed, Volkswagen representatives are scheduled to meet with you on Wednesday, June 2, 2010 at 09:30 to discuss road load determination and the responses to the questions provided in your e-mail of April 2, 2010. Our representatives are preparing a formal presentation and formulating the responses to the questionnaire.

I had previously stated that one or two people from our local office and another two or three from Germany would attend. Considering the travel time and distance for our German colleagues, I would like to know whether it would be acceptable to have them join the meeting by telephone. I would still attend in person and provide the presentation materials, with the technical experts engaged in the dialogue. I am able to set up a conference call-in number and access code.

I would appreciate your thoughts on this. Please recognize that this request should not be construed as minimizing the importance of this meeting. We look forward to a detailed discussion.

Best regards,  
Len

— << File: ATT244576.htm >> << File: c104150.ics >> << File: ecblank.gif >> << File: pic00987.gif >>



**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA  
**Sent:** Mon 8/9/2010 8:13:41 PM  
**Subject:** VW/Audi Meeting with EPA: Misc issues

Hello Jim:

Per our telephone conversation, I am sending a request for a meeting with EPA staff on Thursday afternoon, August 19, 2010.

Preliminary discussion topics would be:

- Worst case emission and emission impact for OBD monitor
- HEV application for certification (example, open points)
- Worst case determination for FE (GHG) and emissions e.g. Start/Stop Switch
- Emission warranty part list for HEV parts and A/C system (GHG)
- Determination of OBD relevance
- Specific Hybrid test issues

I believe that we would need about 2 hours. I will try to refine the list of topics and provide better explanation.

Best regards,  
Len

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Geisen, Anna (I/EA-523)" [anna.geisen@AUDI.DE]; Thomas, Suanne" [Suanne.Thomas@vw.com]; Johnson, Stuart" [Stuart.Johnson@vw.com]; hris Nevers/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; Martin Reineman/AA/USEPA/US@EPA; Tom Anderson/AA/USEPA/US@EPA; "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; oel Ball/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; Martin Reineman/AA/USEPA/US@EPA; Tom Anderson/AA/USEPA/US@EPA; "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; tephnen Healy/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; Martin Reineman/AA/USEPA/US@EPA; Tom Anderson/AA/USEPA/US@EPA; "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; inc Wehrly/AA/USEPA/US@EPA; Martin Reineman/AA/USEPA/US@EPA; Tom Anderson/AA/USEPA/US@EPA; "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; artin Reineman/AA/USEPA/US@EPA; Tom Anderson/AA/USEPA/US@EPA; "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; om Anderson/AA/USEPA/US@EPA; "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]  
**From:** "Kata, Leonard"  
**Sent:** Sun 8/15/2010 10:40:16 PM  
**Subject:** Accepted: VW/Audi Meeting with EPA: Misc issues

**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; artin Reineman/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; om Anderson/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Wed 8/18/2010 5:50:13 PM  
**Subject:** RE: Audi Meeting with EPA: Discussion topics  
[00 final 08-19-2010.pdf](#)

Hello everyone:

I have attached a copy of the presentation materials that we wish to discuss during our meeting tomorrow. I will bring a few copies and our portable projector to show the slides.

See you at 1 p.m. tomorrow (Aug. 19, 2010).

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, August 17, 2010 11:03 AM  
To: Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov; Kata, Leonard; Healy.Stephen@epamail.epa.gov; Wehrly.Linc@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Anderson.Tom@epamail.epa.gov  
Subject: Audi Meeting with EPA: Discussion topics

Audi AG has provided a more refined list of discussion topics. These are shown below:

EPA Meeting

- \* Idle stop system – Last mode strategy
- \* Worst case mode for emission certification and OBD emission impact tests
- \* EPA position on Evap Test procedure for PHEV
- \* HEV application for certification
- \* New emission related components for MY 2012 GHG
- \* MIL on and additional information / text message
- \* Audi Hybrid and battery cooling at the dynamometer
- \* Clarification of dynamometer test mode for future vehicles

See you on Thursday.

**To:** Linc Wehrly/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Fri 9/24/2010 3:24:40 PM  
**Subject:** RE: EPA/Audi Meeting Report  
[01 st-st FTP data.pdf](#)

Hello all:

As mentioned in the meeting report provided earlier today, EPA requested some data to support a management decision regarding testing of a start-stop device. Attached, please find a short presentation that includes a modal analysis and description of the emissions impact due to the use of the device. In my telephone conversation with Linc earlier today, and my message to Jim, I believe that I referred to the start/stop system as using a "default-on strategy." This is not correct. In our presentation from August 19, 2010 and the attachment to this e-mail, we identify the system as using a "last mode strategy." The intent would be to conduct the testing in the "On" mode.

Our request is for approval for testing GHG CO2 with the system active, assuming that a field survey later demonstrates that this is the predominant operating mode.

If an official response is not possible at this time, some indication of EPA's thoughts and inclination would be appreciated.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Kata, Leonard

Sent: Friday, September 24, 2010 8:58 AM

To: 'wehrly.linc@epa.gov'; 'Snyder.Jim@epamail.epa.gov'; Healy.Stephen@epamail.epa.gov;  
Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov

Subject: EPA/Audi Meeting Report

Hello all:

Attached is a copy of a report from a meeting between you and representatives of Audi AG and Volkswagen Group of America, Inc. This meeting was held on August 19, 2010.

Please note the open issues in the "Comments" section.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** CN=Lynn Sohacki/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=Arvon Mitcham/OU=AA/O=USEPA/C=US@EPA;CN=Bruce Garrison/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=JohnH White/OU=AA/O=USEPA/C=US@EPA;CN=Kim Cieslak/OU=AA/O=USEPA/C=US@EPA;CN=Mark Maury/OU=AA/O=USEPA/C=US@EPA;"Berenz, Sebastian" [Sebastian.Berenz@vw.com]; N=Bruce Garrison/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=JohnH White/OU=AA/O=USEPA/C=US@EPA;CN=Kim Cieslak/OU=AA/O=USEPA/C=US@EPA;CN=Mark Maury/OU=AA/O=USEPA/C=US@EPA;"Berenz, Sebastian" [Sebastian.Berenz@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=JohnH White/OU=AA/O=USEPA/C=US@EPA;CN=Kim Cieslak/OU=AA/O=USEPA/C=US@EPA;CN=Mark Maury/OU=AA/O=USEPA/C=US@EPA;"Berenz, Sebastian" [Sebastian.Berenz@vw.com]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=JohnH White/OU=AA/O=USEPA/C=US@EPA;CN=Kim Cieslak/OU=AA/O=USEPA/C=US@EPA;CN=Mark Maury/OU=AA/O=USEPA/C=US@EPA;"Berenz, Sebastian" [Sebastian.Berenz@vw.com]; N=JohnH White/OU=AA/O=USEPA/C=US@EPA;CN=Kim Cieslak/OU=AA/O=USEPA/C=US@EPA;CN=Mark Maury/OU=AA/O=USEPA/C=US@EPA;"Berenz, Sebastian" [Sebastian.Berenz@vw.com]; N=Kim Cieslak/OU=AA/O=USEPA/C=US@EPA;CN=Mark Maury/OU=AA/O=USEPA/C=US@EPA;"Berenz, Sebastian" [Sebastian.Berenz@vw.com]; N=Mark Maury/OU=AA/O=USEPA/C=US@EPA;"Berenz, Sebastian" [Sebastian.Berenz@vw.com]; Berenz, Sebastian" [Sebastian.Berenz@vw.com]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Tom Ball/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/14/2010 5:15:10 PM  
**Subject:** Re: Preliminary reply

Lynn,

Make sure we get agreement with them on the drain & fill procedures.

Tom

**From:** Lynn Sohacki/AA/USEPA/US  
**To:** "Berenz, Sebastian" <Sebastian.Berenz@vw.com>  
**Cc:** Tom Ball/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA, Kim Cieslak/AA/USEPA/US@EPA, Bruce Garrison/AA/USEPA/US@EPA, Mark Maury/AA/USEPA/US@EPA, JohnH White/AA/USEPA/US@EPA  
**Date:** 10/14/2010 12:58 PM  
**Subject:** Preliminary reply



Hi, Sebastian.

Thank you for your two letters, one asking for additional preconditioning and the other requesting approval for a revised vehicle preparation and preconditioning procedure. I am currently preparing letters replying to your questions. However, because the timing on these subjects is somewhat urgent, I am responding informally via e-mail and will respond with letters shortly.

In response to the request for preconditioning, we will not allow the additional preconditioning. Among other reasons, the request for preconditioning was limited to vehicles from model year 2007 and earlier. The current class is a 2008 model year test group.

Regarding the revised vehicle preparation and preconditioning procedure, we suggest a slightly different procedure than the one that you proposed: The vehicle will be run until the engine stalls. The vehicle will immediately be refilled with a gallon of indolene and the engine will be started and idled for five minutes to minimize the effect of the air trapped in the fuel system.

A second drain and fill will be conducted in the same way, however, the order of the second drain and fill in the FTP will change. The second drain and fill will come after the vehicle soak and before the preconditioning drive. This will give time for any air that may have been introduced into the fuel lines to be purged during the preconditioning drive. Because this preconditioning will occur after the drain and fill, EPA will not run an additional cold start FTP-72 as requested in your letter.

I apologize for this informal response to your letters and will follow up with a more formal response soon.

Please call if you have any questions.

Lynn Sohacki  
Environmental Protection Agency  
734-214-4851  
734-214-4869 (fax)

**To:** mike.hennard@VW.com[]  
**Cc:** CN=Tom Ball/OU=AA/O=USEPA/C=US@EPA;CN=Arvon Mitcham/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Arvon Mitcham/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Lynn Sohacki/OU=AA/O=USEPA/C=US  
**Sent:** Fri 10/22/2010 5:59:22 PM  
**Subject:** More information re the Audi Q7  
[mike.hennard@vw.com](mailto:mike.hennard@vw.com)

Hi, Mike.

We are still waiting for some answers to questions regarding Q7 class that were brought up during our 7/29/10 meeting. Specifically, was the MIL on when VW recruited Ex. 6? Please give us a description of the fault that was recorded that led to the VW fix. What were the number of warranty claims for the component that was replaced on Ex. 6?

Thank you in advance for your answers.

Sincerely,

Lynn Sohacki  
Environmental Protection Agency  
734-214-4851  
734-214-4869 (fax)

----- Forwarded by Lynn Sohacki/AA/USEPA/US on 10/22/2010 01:40 PM -----

**From:** Lynn Sohacki/AA/USEPA/US  
**To:** "Hennard, Mike" <mike.hennard@vw.com>  
**Date:** 08/12/2010 04:27 PM  
**Subject:** Re: VW Presentations - July 29

Hi, Mike.

We are wondering if you have answers to the other questions that we posed to VW during our meeting. Specifically, you were going to investigate whether the MIL was on or if any fault codes were set when VW recruited vehicle with VIN ending 1590 after it failed at EPA.

Thanks.

Lynn Sohacki  
Environmental Protection Agency  
734-214-4851  
734-214-4869 (fax)

From: "Hennard, Mike" <mike.hennard@vw.com>  
To: Lynn Sohacki/AA/USEPA/US@EPA  
Cc: "Kohnen, Christoph (VWGoA)" <christoph.kohnen@vw.com>, "Johnson, Stuart" <Stuart.Johnson@vw.com>  
Date: 08/05/2010 09:33 AM  
Subject: VW Presentations - July 29

Lynn:

As you requested, here are PDF format copies of presentation we gave in July 29th meeting at your office.

One additional question, can you supply EPA data sheet for 3.1L vehicles (similar to data sent for 4.2L vehicles).

Michael Hennard

Manager - Emissions Compliance EEO

Volkswagen Group of America

3800 Hamlin Road

Auburn Hills, MI 48326

Telephone Number: 248 754 4202

Fax: 248 754 4207

mike.hennard@vw.com

[attachment "Meeting\_EPA\_Surveillance\_8ADXV03 1374 work to EPA.pdf" deleted by Lynn Sohacki/AA/USEPA/US] [attachment "Surveillance\_7ADXT04.2358 epa.pdf" deleted by Lynn Sohacki/AA/USEPA/US]

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Mon 11/29/2010 6:02:22 PM

**Subject:** VW Pre-Cert mtg and 2012 pre-model year GHG report

**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; om Anderson/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;"Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; oberts French/AA/USEPA/US@EPA;"Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]  
**From:** "Kata, Leonard"  
**Sent:** Wed 12/1/2010 1:49:44 PM  
**Subject:** RE: Invitation: VW Pre-Cert mtg and 2012 pre-model year GHG report (Dec 1 01:00 PM EST in AA-C126/AA-OTAQ-OFFICE@EPA)  
[2012 Cert Preview General.pdf](#)

Hello All:

I am looking forward to our meeting this afternoon. I have attached a copy of a slide presentation version of the general portion of our certification preview letter submitted via VERIFY. I will also bring copies of these slides for distribution.

We will also be bringing a letter and presentation materials for the GHG 2012 Pre-Model Year Report and two presentations concerning strategies for Air Conditioning Credits.

As I have mentioned, my manager, Dr. Christoph Kohnen will be joining the meeting.

Best regards,

Len

<<2012 Cert Preview General.pdf>>

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

-----Original Appointment-----

From: Jim Snyder/AA/USEPA/US

Sent: Monday, November 29, 2010 1:02 PM

To: Jim Snyder/AA/USEPA/US; Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov; Kata, Leonard; Wehrly.Linc@epamail.epa.gov; Healy.Stephen@epamail.epa.gov; Anderson.Tom@epamail.epa.gov

Cc: Good.David@epamail.epa.gov; French.Roberts@epamail.epa.gov

Subject: Invitation: VW Pre-Cert mtg and 2012 pre-model year GHG report (Dec 1 01:00 PM EST in AA-C126/AA-OTAO-OFFICE@EPA)

When: Wednesday, December 01, 2010 1:00 PM-3:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: C126 (lobby )

Invitation: VW Pre-Cert mtg and 2012 pre-model year GHG report

12/01/2010 -

Chair:

Jim Snyder/AA/USEPA/US

Sent By:

Snyder.Jim@epamail.epa.gov

Location:

C126 (lobby )

Rooms:

AA-C126/AA-OTAO-OFFICE@EPA

AA-C127/AA-OTAO-OFFICE@EPA

Snyder.Jim@epamail.epa.gov

Jim Snyder has invited you to a meeting. You have not yet responded.

Required:

Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Leonard.Kata@vw.com, Linc

Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA

Optional:

David Good/AA/USEPA/US@EPA, Roberts French/AA/USEPA/US@EPA

Description

<< File: ATT372448.htm >> << File: c130220.ics >> << File: ecblank.gif >> << File: pic07536.gif >>

**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; artin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; om Anderson/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Mon 12/20/2010 12:39:41 PM  
**Subject:** RE: Invitation: Audi phone conference: Start/stop and manual trans (Dec 20 10:00 AM EST in AA-N62-ASD&CISD/AA-OTAQ-OFFICE@EPA)  
01\_STSTSY-survey and MT.PDF

Hello All:

Attached are a few slides for our conference call this morning.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

<<01\_STSTSY-survey and MT.PDF>>

-----Original Appointment-----

From: Jim Snyder/AA/USEPA/US

Sent: Tuesday, December 14, 2010 5:49 PM

To: Jim Snyder/AA/USEPA/US; Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov; Kata, Leonard; Wehrly.Linc@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov; Anderson.Tom@epamail.epa.gov



Subject: Invitation: Audi phone conference: Start/stop and manual trans (Dec 20 10:00 AM EST in AA-N62-ASD&CISD/AA-OTAQ-OFFICE@EPA)  
When: Monday, December 20, 2010 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).  
Where:

Invitation: Audi phone conference: Start/stop and manual trans

12/20/2010 -

Chair:  
Jim Snyder/AA/USEPA/US

Sent By:  
Snyder.Jim@epamail.epa.gov

Rooms:  
AA-N62-ASD&CISD/AA-OTAQ-OFFICE@EPA

Snyder.Jim@epamail.epa.gov  
Jim Snyder has invited you to a meeting. You have not yet responded.

Required:  
Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Leonard.Kata@vw.com, Linc Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA

Description

EPA room phone is Ex. 6

I will try to get some materials to you prior to the call. To be more specific about the topics:

1. General discussion concerning start-stop devices.
2. Shift speeds for manual transmission vehicles with start-stop devices << File: ATT1507133.htm >> << File: c174846.ics >> << File: ecblank.gif >> << File: pic07156.gif >>

**To:** Joel Ball/AA/USEPA/US@EPA[]  
**Cc:** Arvon Mitcham/AA/USEPA/US@EPA;"Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Cooke, Anthony" [Anthony.Cooke@vw.com]  
**From:** "Hennard, Mike"  
**Sent:** Wed 6/29/2011 1:54:45 PM  
**Subject:** VWGoA Emission Defect Reports - Submission to EPA VERIFY reporting system  
Memo -CBI - EDIR Template 06-21-2011 (3).doc  
mike.hennard@vw.com

Joel:

Per our telephone conversation yesterday afternoon, I am sending to you a draft of VWGoA's forwarding letter to be attached to EDIR reports submitted to EPA via the VERIFY data system.

As e discussed, VWGoA is requesting that this forwarding letter be considered confidential and not be downloaded to the EPA website for public viewing. Please let us know if this CBI procedure is acceptable to EPA staff. If acceptable, VWGoA will attach this (CBI) forwarding letter to all electronically submitted defect reports in the future.

Thanks for your assistance,

Michael Hennard

Manager - Emissions Compliance EEO

Volkswagen Group of America

3800 Hamlin Road

Auburn Hills, MI 48326

Telephone Number: 248 754 4202

Fax: 248 754 4207

mike.hennard@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; oberts French/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; artin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; om Anderson/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA[]

**From:** "Kata, Leonard"

**Sent:** Wed 9/28/2011 9:40:19 PM

**Subject:** VW Group Meeting

00 PHEV-Meeting EPA Sept 2011.pdf

Vorstellung 1 4 Hybrid 2011 EPA.pdf

To all:

I have attached advance copies of the materials that the Volkswagen Group will present at the meeting scheduled for tomorrow afternoon.

If I have missed anyone that should be informed, please forward a copy.

We will also bring paper copies to the meeting.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** David Good/AA/USEPA/US@EPA; "Ex. 7 @ARB" Ex. 7 @arb.ca.gov; Ex. 7  
Ex. 7 @ARB" Ex. 7 @arb.ca.gov]  
**Cc:** Joel Ball/AA/USEPA/US@EPA;"Johnson, Stuart" [Stuart.Johnson@vw.com]; Johnson,  
Stuart" [Stuart.Johnson@vw.com]  
**From:** "Popa, Edward"  
**Sent:** Mon 12/7/2009 4:34:18 PM  
**Subject:** MY2005 - Full Useful Life Vehicle for Test Group 5AD XV02.0352  
<mailto:edward.popa@audi.com>  
<http://www.vw.com>  
<http://www.audiusa.com>

Hallo Dave, Hallo John,

As we already talked on the phone, we have difficulties to find the full useful life vehicles for one test groups in MY2005.

For the procurement of the vehicles is our contractor California-Environmental-Engineering (CEE) responsible.

The following describes the actual situation of the test group.

- Test-Group 5AD XV02.0352

There are 4 vehicles to be tested in this group, 2 vehicles warm and 2 cold weather.

So far we have tested following vehicles:

- VIN# Ex. 6 from CA with a mileage of 59,029 miles\_\_Vehicle passed all Standards
- VIN# Ex. 6 from CO with a mileage of 52,410 miles\_\_Vehicle passed all Standards
- VIN# Ex. 6 from MI with a mileage of 88,975 miles\_\_Vehicle passed all Standards

In order to get a vehicle with a odometer over 90,000 miles for the full useful life test, we already have sent a second mailing out in CA and we mailed to all Customers in MI without getting a successful respond.

The highest mileage that we have on a vehicle available for this test group at the moment is the third vehicle mentioned above, with 88,975 miles.

Dave Good agreed on the phone that he will accept this vehicle as a full useful life.

@ **Ex. 7**

Dave asked me to send the information about the mileage of the vehicles tested so far in this test group to all the parties involved, and also to get your approval.

Meanwhile I will report the vehicle in Verify as a full useful life.

Please let me know as soon as you can what your decision/opinion is.

Thank you all for your understanding and support,

Edy

Edward-Fabian Popa  
Manager In-Use Emission Compliance

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Fax: +1 248 754 4207  
mailto:edward.popa@audi.com  
<http://www.vw.com>  
<http://www.audiusa.com>

**To:** "Berenz, Sebastian (Sebastian.Berenz@vw.com)" [Sebastian.Berenz@vw.com];  
matthias.barke@vw.com" [matthias.barke@vw.com]  
**Cc:** Joel Ball/AA/USEPA/US@EPA[]  
**From:** Ex. 7 @ARB"  
**Sent:** Mon 5/2/2011 8:48:49 PM  
**Subject:** Volkswagen lab audit  
Lab Audit 4 29 11.pdf

Sebastian, Matthias

Attached you will find a copy of the lab audit in Westlake Village.

Thank you

**Ex. 7**

California Environmental Protection Agency

Air Resources Board

In-Use Compliance Section

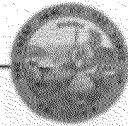
626-459-4404



Linda S. Adams  
Acting Secretary for  
Environmental Protection

## Air Resources Board

Mary D. Nichols, Chairman  
9480 Telstar Avenue, Suite 4  
El Monte, California 91731 • [www.arb.ca.gov](http://www.arb.ca.gov)



Edmond G. Brown Jr.  
Governor

TO:

**Ex. 7**

FROM:

**Ex. 7**

DATE: April 29, 2011

SUBJECT: Volkswagen of America IUVP AUDIT – MARCH 22, 2011

---

As part of the ongoing In-Use Verification Program (IUVP), staff from the ARB In-Use Compliance Section completed the annual audit at the Volkswagen of America's (VW) emissions laboratory located in Westlake Village, California. The audit is conducted to verify that VW observes the required procedures and methods for procuring and testing vehicles for the IUVP as defined by the California Code of Regulations, Title 13, Section §1961(d), and the Code of Federal Regulations 40 Part §86.1845.

### Laboratory Inspection

ARB staff utilized a selection of National Institute of Standards and Technology (NIST) gases to verify that VW's exhaust sampling analyzers and Sealed Housing for Evaporative Determination (SHED) meet the required two percent tolerance between the analyzer detected gas concentration to the injected NIST gas concentration. As shown in Attachment I, the exhaust analyzers in VW's test Cell A, (utilized for testing gasoline fueled vehicles) test cell D, (utilized for testing diesel and gasoline fueled vehicles), and SHED hydrocarbon analyzer were within the required limit.

ARB staff witnessed an IUVP test vehicle undergoing a dynamometer preconditioning cycle followed by a drain and fill sequence of the test vehicle's fuel. These laboratory practices were deemed acceptable.

ARB staff reviewed the calibration and maintenance records for the analyzers and dynamometers that had been generated during the past year. These records were

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website:*  
<http://www.arb.ca.gov>.

California Environmental Protection Agency



up-to-date and in good order. Also, the annual calibrations for the temperature monitoring system, the Critical Flow Orifice kit, gas divider, and the fuel totalizer were up-to-date.

**Procurement**

ARB staff also looked at several random test packets of IUV test vehicles (i.e., vehicles tested within the last 12 months) reviewing the various emissions reports and procurement information. Each IUV test packet was found in good order.

cc: Matthias Barke, Volkswagen of America  
Sebastian Bernez, Volkswagen of America  
Joel Ball, U. S. EPA

**Attachments:**

- VW Gas Analyzer Audit Results (Attachment I)

# Attachment I

## VW Gas Analyzer Audit Results

Test Cell A								
Gas	Range	ppm	Cylinder Value	Reading	% Diff	Cylinder #	Analytical Bench	Pass/Fail
NOx	25	ppm	19.330	19.08	-1.293	FF31622	A	pass
HC	10	ppm	8.770	8.783	1.688	CLM01040	A	pass
HC	30	ppm	8.646	8.648	0.023	FF28520	A	pass
CH4	10	ppm	1.079	1.088	0.834	XF0001153	A	pass
CH4	50	ppm	9.510	9.532	0.231	CC88008	A	pass
CO	25	ppm	9.825	9.792	-0.336	CAL015287	A	pass
CO	100	ppm	49.070	49.08	0.020	CAL016972	A	pass
CO2	2	%	0.971	0.9663	-0.484	CAL01362	A	pass
Test Cell D								
Gas	Range	ppm	Cylinder Value	Reading	% Diff	Cylinder #	Analytical Bench	Pass/Fail
NOx	25	ppm	19.330	19.016	-1.624	FF31622	D	pass
NOx	25	ppm	9.360	9.435	0.909	CC168220	D	pass
HC	10	ppm	8.770	8.779	1.169	CLM01040	D	pass
HC	30	ppm	8.646	8.694	0.555	FF28520	D	pass
HC	90	ppm	29.649	29.675	0.088	CAL017733	D	pass
CH4	10	ppm	1.079	1.075	-0.371	XF0001153	D	pass
CH4	50	ppm	9.500	9.535	0.368	CC88008	D	pass
CO	25	ppm	9.825	9.75	-0.763	CAL015287	D	pass
CO	100	ppm	49.070	48.97	-0.204	CAL016972	D	pass
CO2	2	%	0.971	0.9703	-0.072	CAL01362	D	pass
SHED								
HC	10	ppm	8.646	8.55	-1.110	FF28520	Shed	pass
HC	50	ppm	29.649	29.43	-0.739	CAL017733	Shed	pass

**To:** Joel Ball/AA/USEPA/US@EPA[]  
**From:** "Berenz, Sebastian"  
**Sent:** Tue 5/17/2011 12:39:13 PM  
**Subject:** VWGoA IUVP question  
[sebastian.berenz@vw.com](mailto:sebastian.berenz@vw.com)

Hello Mr. Ball,

Like recently discussed, I have problems to find one specific car out of one of our test groups in the high mileage program for MY2006 with the right mileage requirement.

- Test group: 6AD XV04.2345
- Emission standard: LEV I - LEV / InT2 - Bin 9
- Engine: 4.2L / V8 335 hp
- Carlines: Audi S4 / S4 Avant/Audi A6 quattro/VW Phaeton/Audi A8 /  
A8L/Audi S4 Cabriolet
- Sold cars for test group: 10175

The problem is that we have two EVAP families in this test group. One of them is for the VW Phaeton and we only sold 118 cars all over the US.

The only car that I can find has 42.000 mi on it and the requirement is 50.000 mi.

It would be great if you can approve this car for our program.

If you have any questions please let me know.

Thank you very much.

Best regards

Sebastian Berenz

Manager In-Use Emission Compliance

Environmental Engineering Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

United States of America

Phone: (248) 754-4211  
Cell: (248) 736-3487  
FAX: (248) 754-4207  
E-Mail: sebastian.berenz@vw.com

<http://www.volkswagen.com>

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Joel Ball/AA/USEPA/US@EPA[]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Johnson, Stuart" [Stuart.Johnson@vw.com]  
**From:** "Berenz, Sebastian"  
**Sent:** Fri 6/24/2011 1:31:45 PM  
**Subject:** VW/Audi IUVP program MY2006 and MY2010  
[sebastian.berenz@vw.com](mailto:sebastian.berenz@vw.com)

Hello Mr. Ball,

A few days ago we discussed VW's and Audi's IUVP program and the status on it in a phone call.

I just want to give you a short summary on this.

Like I already explained we are assuming that the IUVP program will not be finished by the end of July this year.

Our assumption is that we will be finished by the end of September this year with high mileage program for MY2006 and low mileage program for MY2010.

We will try to schedule everything as tight as we can to finish earlier, but it really depends on customer participation and our laboratory.

One major reason for that delay is, that we have a hard time finding the right cars per test groups with the right mileage and getting the customers convinced to participate in our program.

We are constantly trying to improve this as good as we can.

Another disadvantage is, that we had some technical problems with our SHED chamber in our laboratory in Westlake Village, CA.

Like I already told you, we are capable of measuring only one SHED vehicle per week. This bottleneck decelerates our MY2006s and MY2010s program tremendously when technical problems occur.

The status so far:

For MY2006 there are only six cars left to be tested. MY2010 will be started in the next few weeks.

I will give you an update on all our projects after the end of July.

The test data will be submitted constantly as soon as I have received the results.

I just wanted to inform you about this situation timely before any delay occurs.

Please let me know if you have any questions.

Thank you very much.

Sincerely

Sebastian Berenz

Manager In-Use Emission Compliance

Environmental Engineering Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

United States of America

Phone: (248) 754-4211  
Cell: (248) 736-3487  
FAX: (248) 754-4207  
E-Mail: sebastian.berenz@vw.com

<http://www.volkswagen.com>

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Joel Ball/AA/USEPA/US@EPA[]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]  
**From:** "Hennard, Mike"  
**Sent:** Wed 6/29/2011 3:01:21 PM  
**Subject:** VWGoA Service Package - Extended Warranty (VWGoA May Meeting with EPA Staff)  
[mike.hennard@vw.com](mailto:mike.hennard@vw.com)

Joel:

This mail is to inform you of VWGoA's decision to reconsider the initial 8 year / 80,000 mile warranty extension that was presented to you in our earlier EPA meeting, at the Ann Arbor facility. It is now Volkswagens intent to offer a full useful life extended warranty for 10 years / 120,000 miles to subject US customers as part of the upcoming Service Package, for replacement of PCV valves, IMRC motors and fuel pressure sensors on specific MY 2005 to 2011 Volkswagen and Audi vehicles, produced with (EA113) 2.0L engines.

All other aspects of this Service Package will be as discussed in our May meeting. A VERR will also be submitted to EPA as soon as it is available.

As usual, if you have any questions, do not hesitate to contact Christoph Kohnen or myself to discuss.

Regards,

Michael Hennard

Manager - Emissions Compliance EEO

Volkswagen Group of America

3800 Hamlin Road

Auburn Hills, MI 48326

Telephone Number: 248 754 4202

Fax: 248 754 4207

mike.hennard@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA[]; oberts French/AA/USEPA/US@EPA[]  
**Cc:** Joel Ball/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; artin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; om Anderson/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Thur 9/22/2011 3:36:40 PM  
**Subject:** RE: Invitation: Mtg with VW Audi: PHEV fuel economy, labeling and misc certification (Sep 29 01:00 PM EDT in AA-C126/AA-OTAQ-OFFICE@EPA)

Hello everyone:

I am looking forward to our meeting next week. I have been asked by one of my colleagues from Volkswagen AG about the possibility of extending the meeting by approximately 30 minutes. The meeting is currently scheduled for 1:00 – 3:00 p.m. on September 29, 2011.

Volkswagen would like to take the opportunity to provide an introductory technical presentation on a 1.4L hybrid concept. The additional information would extend the meeting until 3:30 p.m. Participation by emission certification staff would be appreciated.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

-----Original Appointment-----

From: Jim Snyder/AA/USEPA/US

Sent: Monday, August 22, 2011 5:19 PM

To: Jim Snyder/AA/USEPA/US; Nevers.Chris@epamail.epa.gov; Kata, Leonard; Wehrly.Linc@epamail.epa.gov; French.Roberts@epamail.epa.gov  
Cc: Ball.Joel@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov; Anderson.Tom@epamail.epa.gov  
Subject: Invitation: Mtg with VW Audi: PHEV fuel economy, labeling and misc certification (Sep 29 01:00 PM EDT in AA-C126/AA-OTAQ-OFFICE@EPA)  
When: Thursday, September 29, 2011 1:00 PM-3:00 PM (GMT-05:00) Eastern Time (US & Canada).  
Where:

Invitation: Mtg with VW Audi: PHEV fuel economy, labeling and misc certification

09/29/2011 -

Chair:  
Jim Snyder/AA/USEPA/US

Sent By:  
Snyder.Jim@epamail.epa.gov

Rooms:  
AA-C126/AA-OTAQ-OFFICE@EPA  
AA-C127/AA-OTAQ-OFFICE@EPA

Snyder.Jim@epamail.epa.gov

Jim Snyder has invited you to a meeting. You have not yet responded.

Required:  
Chris Nevers/AA/USEPA/US@EPA, Leonard.Kata@vw.com, Linc Wehrly/AA/USEPA/US@EPA, Roberts French/AA/USEPA/US@EPA

Optional:  
Joel Ball/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA

#### Description

We have some folks visiting the US for a number of meetings, and would like to use the opportunity to discuss PHEV fuel economy and labeling, and other certification/emission testing topics. We would like about 2 hours in the afternoon.

Best regards,

Len << File: ATT53879.htm >> << File: c171901.ics >> << File: ecblank.gif >> << File: pic23877.gif >>

**To:** Joel Ball/AA/USEPA/US@EPA[]  
**From:** "Berenz, Sebastian"  
**Sent:** Mon 9/26/2011 3:25:30 PM  
**Subject:** VWGoA IUVP - MY2006 High Mileage and MY2010 Low Mileage Program  
[sebastian.berenz@vw.com](mailto:sebastian.berenz@vw.com)

Hello Mr. Ball,

Like recently discussed, we are still in the process to finish up our high mileage program for MY2006 and low mileage program for MY2010.

Since we are a little bit late, I just want to keep you informed about our activities.

Status:

- For IUVP HM MY2006 we already tested 61 cars which are already submitted via verify. The high altitude part is finished and submitted too. We still have 5 more cars to do which are lined up.
- For IUVP LM MY2010 we already tested 12 cars which are also already submitted via verify. We still have 10 more cars to do.

We are working hard to get the last cars to our laboratory in Westlake Village, CA. The 10 cars for MY 2010 will all be shipped from Michigan and some are already on the way.

In order to be prepared for the next program, we are right now working on high mileage program MY2007. Customers will be contacted within the next few weeks. The plan is to get as much cars as possible from MY2007 by the end this year. Then we go on by the beginning of next year.

If I don't hear anything back from you, I will proceed with the program to finish everything up.

Please let me know if you have any questions to our activities.

Thank you.

Best regards

Sebastian Berenz

Manager In-Use Emission Compliance

Engineering Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

United States of America

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Cell: (248) 736-3487

FAX: (248) 754-4207

E-Mail: sebastian.berenz@vw.com

<http://www.volkswagen.com>

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** []

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Tue 12/6/2011 4:32:45 PM

**Subject:** VW Pre-Cert mtg

**To:** "Hennard, Mike" [mike.hennard@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Joel Ball/OU=AA/O=USEPA/C=US  
**Sent:** Fri 12/2/2011 3:35:31 PM  
**Subject:** location of EDIRs

Hi Mike,

The EDIRs are posted on <http://www.regulations.gov>. The best way I found to locate them is to type EDIR into the keyword search bar (which will only pull up some of them) then click on the Open Docket Folder link on any one of them and that should take you to the "Light-Duty Vehicle Emission Defect Information Reports" folder.

Good luck

Joel Ball  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4238  
[ball.joel@epa.gov](mailto:ball.joel@epa.gov)

**To:** christoph.kohnen@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Joel Ball/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/28/2009 8:31:39 PM  
**Subject:** VERR 2009/08/07

Hello Mr. Kohnen,

I received the mentioned VERR. I was a little surprised to see that VW is replacing the glow plugs as part of the repair procedure. Could you please explain the reason for replacing the glow plugs? Were there failures or defects found? If so, was there a defect report issued for these problems? Will there be a VERR issued to replace the glow plugs on automatic transmission vehicles?

Best Regards,

Joel Ball  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4238  
ball.joel@epa.gov



To: [REDACTED] Ex. 6  
[REDACTED] Ex. 6  
[REDACTED] Ex. 6 Ex. 7  
[REDACTED] Ex. 7 Ex. 6  
[REDACTED] Ex. 6  
[REDACTED] Ex. 6 Ex. 7  
[REDACTED] Ex. 7; het  
[REDACTED] Ex. 6  
[REDACTED] Ex. 6 Ex. 7  
[REDACTED] Ex. 7  
[REDACTED] Ex. 6  
[REDACTED] Ex. 6 Ex. 7  
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[REDACTED] Ex. 7 Ex. 6  
[REDACTED] Ex. 6 Ex. 7  
[REDACTED] Ex. 7 Ex. 6 Ex. 7  
[REDACTED] Ex. 7 Ex. 6 Ex. 7

**Bcc:** CN=Byron Bunker/OU=AA/O=USEPA/C=US[]  
**From:** CN=Ed Nam/OU=AA/O=USEPA/C=US  
**Sent:** Tue 7/12/2011 7:25:45 PM  
**Subject:** Rescheduled:VW Technical Mtg with EPA/NHTSA/CARB (07/13/2011 11:30AM)

Wednesday July 13  
11 AM - 12:30PM  
EPA Headquarters  
Ariel Rios North  
1200 Pennsylvania Ave.

Please come to the Federal Triangle Metro Station entrance to Ariel Rios North and ask the guards to call 564-1682. The entrance to Ariel Rios North is literally on top of the metro station in the middle of the large combined building that constitutes Ariel Rios North and South. The staff will be expecting your call and will escort you to the conference room.

**To:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; inc Wehrly/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; oel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; avid A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA[]; illiam Ott/AA/USEPA/US@EPA[]  
**Cc:** "Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]; Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 5/17/2012 9:22:56 PM  
**Subject:** VW and EPA Meeting - MPI/FSI Fuel Injection System

When: Wednesday, May 30, 2012 8:00 AM-9:00 AM (GMT-05:00) Eastern Time (US & Canada).  
Where: Online Meeting

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

To all:

I have scheduled an online meeting to discuss the Volkswagen Group MPI/FSI Fuel Injection System. If this time is not acceptable or you cannot join this meeting through the internet connection provided, please let me know.

Jim:

I have added the names that you mentioned.

Best regards,

Len

-----  
Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com<mailto:leonard.kata@vw.com>

.....

# Ex. 6

Forgot your dial-in PIN?<<https://dialin.vw.com>> | First online  
meeting?<<http://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>>  
[!OC([1033])!]

---

**To:** CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 6/21/2012 9:49:28 PM  
**Subject:** VW certificate

Joel, VW is re-submitting a certificate after having to change a test number so Verify can do the Litmus test. It hasn't shown up yet so go ahead and approve if it appears friday while i'm out. You can talk to Bill if any questions about it., if it appears.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; liver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; tuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA[]

**From:** CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Tue 8/7/2012 4:06:59 PM

**Subject:** VW/EPA mtg - Merger of VW & Porsche

**To:** CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com[]; eonard.Kata@vw.com[]  
**Cc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 9/11/2012 11:10:44 PM  
**Subject:** Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

---

Hello Jim:

As you know, we have some vehicles at EPA next week for confirmatory testing. There are some colleagues from VWAG Germany that will accompany the test vehicles. This includes Mr. Juergen Peter and Ms. Hannah Schlueter. I have been asked if it would be possible to have a brief, perhaps one hour, meeting with you and other EPA staff, while Mr. Peter and Ms. Schlueter are in Ann Arbor. The topic would concentrate on emission testing, including evaporative emission testing for future advanced technology vehicles.

My proposal would be September 20 or 21, 2012, late morning or early afternoon. Please let me know if you agree to meet with us and what time may be most convenient for you.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com[]; eonard.Kata@vw.com[]  
**Cc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/17/2012 2:57:34 PM  
**Subject:** Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

Len there is a slight chance that I won't be back by thursday for this mtg but I will be in Friday. In case there is a change, Dave's number is 214-4467 and Len's number is 248-754-4204.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



**To:** Jim Snyder/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA[]; oel Dalton/AA/USEPA/US@EPA[]  
**Cc:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 9/20/2012 12:56:07 PM  
**Subject:** RE: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

Hello all:

I have tried to reach Jim and Joel and left messages with each. I would like to verify the status of this meeting scheduled for today. If necessary, we can delay until tomorrow.

Please let me know since I would require about 1 hour+ travel time to Ann Arbor.

Regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, September 17, 2012 10:58 AM  
To: Wright.DavidA@epamail.epa.gov; Dalton.Joel@epamail.epa.gov; Kata, Leonard (EEO)  
Subject: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

Len there is a slight chance that I won't be back by thursday for this mtg but I will be in Friday. In case there is a change, Dave's number is 214-4467 and Len's number is 248-754-4204.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Robert Peavyhouse/AA/USEPA/US@EPA; Tom Anderson/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; "Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; om Anderson/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; "Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; hris Nevers/AA/USEPA/US@EPA; "Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; oel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; "Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; oel Dalton/AA/USEPA/US@EPA; Linc Wehrly/AA/USEPA/US@EPA; "Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; inc Wehrly/AA/USEPA/US@EPA; "Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; oberts French/AA/USEPA/US@EPA; AA-C126/AA-OTAQ-OFFICE [AA-C126/AA-OTAQ-OFFICE@v18h1drtgu300.aa.ad.epa.gov]; A-C126/AA-OTAQ-OFFICE [AA-C126/AA-OTAQ-OFFICE@v18h1drtgu300.aa.ad.epa.gov]; A-C127/AA-OTAQ-OFFICE [AA-C127/AA-OTAQ-OFFICE@v18h1drtgu300.aa.ad.epa.gov]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 9/20/2012 9:38:41 PM  
**Subject:** RE: Invitation: RE: Audi Meeting with EPA (Sep 17 01:00 PM EDT in AA-C126/AA-OTAQ-OFFICE@EPA)  
<mailto:Snyder.Jim@epamail.epa.gov>

Hello Jim:

I thought that you may have mentioned the rescheduling this meeting during our meeting this afternoon.

I cannot seem to find anything. We would just like to nail down some travel plans.

Thanks,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

---

**From:** Kata, Leonard (EEO)  
**Sent:** Monday, September 17, 2012 12:18 PM  
**To:** 'Jim Snyder/AA/USEPA/US'  
**Cc:** Robert Peavyhouse/AA/USEPA/US; Tom Anderson/AA/USEPA/US; Chris Nevers/AA/USEPA/US; Rist, Domenic (I/EA-523); Joel Ball/AA/USEPA/US; Joel Dalton/AA/USEPA/US; Linc Wehrly/AA/USEPA/US; Rech, Lothar (I/EA-523); Schmidt, Oliver (EEO); Roberts French/AA/USEPA/US; AA-C126/AA-OTAQ-OFFICE; AA-C127/AA-OTAQ-OFFICE  
**Subject:** RE: Invitation: RE: Audi Meeting with EPA (Sep 17 01:00 PM EDT in AA-C126/AA-OTAQ-

OFFICE@EPA)  
Importance: High

Hello Jim:

I think that there is some misunderstanding. In my September 11, 2012 e-mail, I had asked for a meeting to cover the topics below on either of the following dates.

Monday, October 29 2012; afternoon  
Tuesday, October 30, 2012; morning

I see that you have scheduled the meeting for today.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

-----Original Appointment-----

From: Jim Snyder/AA/USEPA/US [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, September 17, 2012 11:04 AM  
To: Chris Nevers/AA/USEPA/US; Rist, Domenic (I/EA-523); Joel Ball/AA/USEPA/US; Joel Dalton/AA/USEPA/US; Kata, Leonard (EEO); Linc Wehrly/AA/USEPA/US; Rech, Lothar (I/EA-523); Schmidt, Oliver (EEO); Roberts French/AA/USEPA/US; AA-C126/AA-OTAQ-OFFICE; AA-C127/AA-OTAQ-OFFICE  
Cc: Robert Peavyhouse/AA/USEPA/US; Tom Anderson/AA/USEPA/US  
Subject: Invitation: RE: Audi Meeting with EPA (Sep 17 01:00 PM EDT in AA-C126/AA-OTAQ-OFFICE@EPA)  
When: Monday, September 17, 2012 1:00 PM-3:00 PM (GMT-05:00) Eastern Time (US & Canada).  
Where:

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation

- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification << File: ecblank.gif >> << File: pic05707.gif >> << File: ATT00001.htm >> << File: c110409.ics >>

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;Domenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; omenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; othar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; liver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Wed 9/26/2012 11:21:54 PM

**Subject:** Rescheduled: RE: Audi Meeting with EPA (Oct 29 01:00 PM EDT in AA-601C/AA-OTAQ-LAB@EPA)

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;Domenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; omenic.Rist@audi.de;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;Lothar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; othar.Rech@AUDI.DE;Oliver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; liver.Schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Wed 9/26/2012 11:24:44 PM

**Subject:** Information Update - Subject has changed: Audi Mtg w/ EPA rm 601C

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; Leonard.Kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** []

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Tue 12/6/2011 4:32:45 PM

**Subject:** VW Pre-Cert mtg



**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 5/9/2012 12:55:51 PM  
**Subject:** RE: VW Dual Fuel Calculation

Hello Bob;

Sorry I didn't get a chance to track you down yesterday, I ran out of time. Thanks for the calculation sample. As far as I can see my numbers and calculation are the same. I understand now that the baseline calculated average is our fleet where FFV Bentley Continental models are with gasoline fuel and the AMFA calculation is the where the Continental models are included with the E85 bonus. I assume TPA means test procedure adjustment. So, the baseline calculated fleet average is with the FFV Continental models using gasoline only and the AMFA fleet average with the calculated bonus we get for the FFV models? What does the acronym AMFA mean, adjusted manufacturer fleet average? I originally submitted only the AMFA values. I have submitted another version with the baseline values into Verify. I think we are in agreement now.

I wanted to show you the Audi A8L 4.0L bi turbo demonstration vehicle yesterday. The vehicle is there today with my German colleagues. If you would like to test drive it, let me know and I can have the German guys contact you. This vehicle is equipped with cylinder deactivation and a start/stop system for improved real world, fuel economy.

Thanks,  
Richard 248 754 4213

-----Original Message-----

**From:** Robert Peavyhouse [mailto:Peavyhouse.Robert@epamail.epa.gov]  
**Sent:** Tuesday, May 08, 2012 2:37 PM  
**To:** Thomas, Richard (EEO)  
**Subject:** VW Dual Fuel Calculation

WARNING!!! (from amgwyin01.vwoa.na.vwg)

The following message attachments were flagged by the antivirus scanner:

Attachment [2.2] VW Flex Analysis.xlsx, scan failed: File encrypted. Action taken: incomplete scan

Please contact the Help Desk at x44800 with any questions.

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 5/17/2012 3:49:55 PM  
**Subject:** 2013 Volkswagen & Audi Fuel Economy  
[winmail.dat](#)

Hello Bob;

Before Verify release 10 was came out, I successfully entered an Audi allroad quattro label signed on as Volkswagen (VWX). I am entering more models within the same Audi test group and with Audi carline names and received the following error messages.

Transaction Status Details

Transaction Status Identifier : REJECTED

Transaction Message Text : LD-FE-GL-BR202 - If the Manufacturer Code of the owner of the Representative Test Group (GL-13.5) is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the Test Group. (Test Group = DADXV02.03UB)

Transaction Message Text : LD-FE-GL-BR003 - The Submitter's Manufacturer Code (in Submission Author Details) must match the Carline Manufacturer Code (GL-10).

We then gave Volkswagen (VWX), permission to use the Audi test group DADXV02.03UB and one message went away but the BR003 message remains. We don't want to create Audi carlines in VWX and ask if it would be possible for the label program to ignore the AD and VW in the test group and carline?

I wanted to enter everything under the VWX sign-on so that when it comes time to do CAFE and GHG fleets it doesn't take six months to process the reports. What do you suggest?

I need to resolve this soon because, I have several Audi models in this 2.0L test group that will be released from the ports next week.

I will be back after lunch, if you can touch base with me this afternoon it will help me a lot, I'm sure.

Thanks,  
Richard 248 754 4213

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Thanks,

Richard 248 754 4213

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 5/17/2012 6:09:12 PM  
**Subject:** phone message  
[winmail.dat](#)

Hi Dave;

I got your message but because we have a new crap phone system I am unable to call. I agree with what you said about the name on a certificate. Bentley would, for example, hold a certificate with their name on it and not VW. I will proceed with using the Audi sign on to do my 2013 Audi labels, unless I hear of some other solution from Bob.

Thanks,  
Richard.

**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Fri 5/18/2012 11:28:17 AM  
**Subject:** RE: 2013 data in Verify as of May 11,2012 5PM is attached

Hi Dave;

So the first ten labels on your list will need to be entered again by the brand they represent if I understand you correctly. Please call me when you can so we might discuss the issue.

Thanks,

Richard 248 754 4213

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Thursday, May 17, 2012 4:20 PM  
To: Thomas, Richard (EEO)  
Subject: 2013 data in Verify as of May 11,2012 5PM is attached

Richard,

You are correct. According to the Data Elements, the mfr code field in the FE Label module (GL-2) is assigned by Verify---it is derived by Verify from the users' CDX account.

Attached is the VW/Audi data in Verify just prior to deploying Release 10.

(See attached file: VW Group 2013 FEGuide1-all rel dates-no-sales-5-11-2012.xlsx)

**To:** "Verify Help Desk ([REDACTED])" **Ex. 6**  
**Cc:** David Good/AA/USEPA/US@EPA; Robert Peavyhouse/AA/USEPA/US@EPA[]; obert Peavyhouse/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Fri 5/18/2012 5:55:34 PM  
**Subject:** 2013 Label Inactive Request  
[winmail.dat](#)

**Ex. 6**

I have another issue with regard to 2013 fuel economy labels and have already discussed this with Dave Good at EPA. I have entered a number of 2013 labels signed on as Volkswagen because these models are contained within a Volkswagen test group or I original planned to enter everything for the Volkswagen Group signed on as Volkswagen. The models are actually Audi models. The basis for the QR code is VWX and therefore the Verify system generates a QR code based upon the VWX manufacturer code and cannot direct the customer to the proper label information when our system created the QR Code based upon an ADX manufacturer code.

It is not possible to change our system design to create the codes as a Volkswagen code so the solution was to enter these labels signed on as Audi and enter the model type fuel economy again thereby making the original labels inactive.

Would you please make the following labels inactive or delete them so I may enter them again as Audi:

VWX Index #: 009, 028, 029, and 034

Please delete or make the following indexes inactive for these Volkswagen indexes for these Bentley models:

VWX index #: 010, 011, 012, and 013

Please delete or make the following indexes inactive for these Audi indexes for these Bentley models:

ADX index#: 007 and 008

If you have any questions, please contact me directly.

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com<mailto:Richard.Thomas@VW.com>

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Thanks,

*Richard E. Thomas*

VOLKSWAGEN Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Engineering and Environmental Office (EEO)

Phone: 248 754-4213

Fax: 248 754-4207

[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** David Good/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA[]; obert Peavyhouse/AA/USEPA/US@EPA[]  
**From:** Ex. 6  
**Sent:** Fri 5/18/2012 6:11:18 PM  
**Subject:** Re: 2013 Label Inactive Request (HLP-2585)

Hello Mr. Thomas,

Verify help desk ticket HLP-2585 has been opened for this request.

**Ex. 6**

Verify Help Desk  
Staffed by Computer Sciences Corporation,  
Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Thomas, Richard  
(EEO)"  
<Richard.Thomas@vw.com> To  
cc  
05/18/2012 01:55 ""Good.David@epamail.epa.gov""  
PM <Good.David@epamail.epa.gov>,  
""Robert Peavyhouse  
(Peavyhouse.Robert@epamail.epa.gov)  
""  
<Peavyhouse.Robert@epamail.epa.gov>  
Subject  
2013 Label Inactive Request

Hello **Ex. 6**

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Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
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Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com<mailto:Richard.Thomas@VW.com>

**To:** David Good/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA[]; obert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Richard.Thomas@vw.com[]  
**From:** Ex. 6  
**Sent:** Fri 5/18/2012 7:52:08 PM  
**Subject:** Re: 2013 Label Inactive Request ( HLP-2585)

Hello Mr. Good and Mr. Peavyhouse,

Will you please provide specific direction for us to make the indexes indicated in Mr. Thomas's attached email inactive in the database? Thank you.

**Ex. 6**

Verify Help Desk  
Staffed by Computer Sciences Corporation,  
Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Thomas, Richard  
(EEO)"  
<Richard.Thomas@vw.com> To  
Verify Help Desk@CSC  
cc  
05/18/2012 01:55 ""Good.David@epamail.epa.gov""  
PM <Good.David@epamail.epa.gov>,  
""Robert Peavyhouse  
(Peavyhouse.Robert@epamail.epa.gov)  
""  
<Peavyhouse.Robert@epamail.epa.gov>  
Subject  
2013 Label Inactive Request

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Richard E. Thomas  
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Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com<mailto:Richard.Thomas@VW.com>

**To:** David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]

**Cc:** Linc Wehrly/AA/USEPA/US@EPA; **Ex. 7**

**From:**

**Ex. 7**

**Sent:** Mon 5/21/2012 1:02:41 PM

**Subject:** Testing Strategy Approval Request - Audi Start/Stop Systems

[winmail.dat](#)

Hello Dave;

After our visit with the demonstration 4.0L V8 Audi A8 on May 8th and equipped with cylinder deactivation and start/stop strategy, we reviewed our testing strategy and have the following request.

The 3.0L V6 engine equipped Audi A8 emission data vehicle tested on May 2nd and May 8th at the EPA facility, was tested in two configurations. That is: complete five cycle tests with start/stop active and a complete second set of tests with start/stop system inactive at our facility in Ingolstadt . EPA confirmed the city tests in both configurations, start/stop active and inactive. Under the start/stop enable conditions you saw during the presentation, it is clear that the engine does not stop during three of the 5-cycle tests. There is no engine shut down in Highway, SC03 and Cold CO test cycles and only marginal engine stop in the US06 test cycle. The current start/stop strategy would yield on minor fuel economy improvement in the FTP and US06 cycle and therefore we would prefer to test only the FTP and US06 harmonically average the two sets of test configurations together at the 50/50 rate.

The high cost testing burden at our facility would be lessened and testing capacity could improve. Until which time there are some operational start/stop system strategy changes, we would propose to test only the FTP and US06 with start/stop active and inactive and average these tests at the 50/50 rate.

If you have any questions, please contact me directly.

Best regards,

**Ex. 7**

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]; Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Tue 5/29/2012 2:29:13 PM  
**Subject:** Audi Test Group - Lamborghini Gallardo Models  
[winmail.dat](#)

Hello Bob;

I need your input in order to label 2013 Lamborghini Gallardo models that are contained in a 2013 Audi Test group. I attempted to enter index # 030 signed on as NLX (Lamborghini) and received the following error messages from Verify;

Transaction Status Details

Transaction Status Identifier : REJECTED

Transaction Message Text : LD-FE-GL-BR202 - If the Manufacturer Code of the owner of the Representative Test Group (GL-13.5) is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the Test Group. (Test Group = DAD XV05.2LR8)

Transaction Message Text : LD-FE-GL-BR003 - The Submitter's Manufacturer Code (in Submission Author Details) must match the Carline Manufacturer Code (GL-10).

Transaction Message Text : LD-FE-GL-BR154 - Test Groups listed in the Unique Carline/Subconfiguration Test Groups (GL-207) must have one Certified Model Carline the same as the Carline of the Model Type for this FE Label. (Subconfiguration Test Group = DAD XV05.2LR8)

There is a work around for BR154 that I don't want to use now, because I can wait till after the next release 10 deployment on June 1.

Previously we removed a couple of error messages by allowing Audi to use Lamborghini as an alternate manufacture by test group and carline. We have only two carlines 406 Gallardo Coupe and 426 Gallardo Spyder created as Audi division 3 in test group DAD XV05.2LR8. I know you mentioned to me that we should not create more than one carline for a model name.

In an attempt to remove BR202 and BR003 we tried to sign on as Lamborghini and allow Audi as an alternative manufacture but got error processing messages: BR8, BR11, and BR10.

If you can tell me what the latest thinking is regarding the Volkswagen Group situation and manufacture codes, carline and division numbers, I would appreciate it. Perhaps I should enter this as an Audi label and error BR003 will go away. If you feel that the Verify help people are up to speed and should handle this problem, please let me know and I will direct this to them.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
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Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com<mailto:Richard.Thomas@VW.com>





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Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** Verify Help Desk **Ex. 6**  
**Cc:** Robert Peavyhouse/AA/USEPA/US@EPA; David Good/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 6/6/2012 11:12:51 AM  
**Subject:** RE: GTI index 022 (HLP-2623)  
[winmail.dat](#)  
[message\\_body.rtf](#)

Hi **Ex. 6**

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Now I have several model indexes with the same situation, Lamborghini within an Audi Test group. Audi models within a Volkswagen test group and Bentley models within an Audi test group.

Thanks,  
Richard ( 248 754 4213 )

-----Original Message-----

**From:** **Ex. 6** On Behalf Of Verify Help Desk  
**Sent:** Tuesday, June 05, 2012 7:11 PM  
**To:** Thomas, Richard (EEO)  
**Subject:** Re: GTI index 022 (HLP-2623)

Hello Mr. Thomas,

You newly created carline code 211 has to exist in Verify as a certified model. In order to certify this carline you will need to unlock your test group and then add this carline to your test group in the Certified Models section on the Evap/Stnds/Models tab (see screen shot below).

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Please let me know if you have any further questions.

**Ex. 6**

(Embedded image moved to file: pic08624.gif)

Verify Help Desk

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"Thomas, Richard

(EEO)"

<Richard.Thomas@v

To

w.com>

Verify Help Desk@CSC

cc

06/05/2012 12:55

PM

Subject

GTI index 022

Hello **Ex. 6**

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Transaction Message Text : LD-FE-GL-BR98 - The combination of Carline Manufacturer Code (GL-10), Division Code (GL-11), and CarlineCode (GL-12) must exist at least once in the repeated subconfiguration sales information (GL-125.5, GL-125.6, and GL-125.7).

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Subject: Re: GTI index 022 (HLP-2623)

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(EEO)"  
<Richard.Thomas@v  
w.com> To  
Verify Help Desk@CSC  
cc  
06/05/2012 12:55  
PM Subject  
GTI index 022

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"Thomas, Richard  
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<Richard.Thomas@v  
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Verify Help Desk@CSC  
cc  
06/05/2012 12:55  
PM Subject  
GTI index 022

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**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** David Good/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; obert Peavyhouse/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** Ex. 6  
**Sent:** Wed 6/6/2012 2:34:59 PM  
**Subject:** RE: GTI index 022 (HLP-2623)

Hello Mr. Thomas,

Business rule TG-BR67 was returned for this submission because the owner of the carline VWX is different than the submitter's manufacturer code ADX. Because this is the case VWX must grant ADX permission to use a VWX carline.

For the VWX owner to grant permission for ADX to use its carline the VWX submitter must navigate to the Alternate Manufacturer tab of the Maintain Manufacturer Information module and make a submission granting ADX permission to do so.

Business rule TG-BR89 indicates that this Carline 212 is not in the system. Please check to be sure that an accepted carline submission was made for Carline 212.

After your test group submission is accepted a lock request should be made and the 'Yes' radio button should be selected for the 'Revised Certificate Needed' question. A comment can be added in the comment field about the 'Revised Certificate Needed' question indicating that a revised certificate is needed to certify VWX carlines for your general label submission.

I will also call you to discuss.

---

<TransactionStatusIdentifier>REJECTED</TransactionStatusIdentifier>  
<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>  
<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>  
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<TransactionMessageText>TG-BR89 - The provided Carline Manufacturer Code (TG-300), Division Code (TG-301), Carline Code (TG-302), and Model Year (TG-6) must specify a carline that exists in the system. (Manufacturer Code: VWX, Division Code: 1, Carline Code: 212, Model Year: 2013)</TransactionMessageText>  
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</TransactionStatusDetails>

Verify Help Desk  
Staffed by Computer Sciences Corporation,  
Contractor to the Environmental Protection Agency

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cc  
06/06/2012 07:12 ""Robert Peavyhouse  
AM (Peavyhouse.Robert@epamail.epa.gov)  
""  
<Peavyhouse.Robert@epamail.epa.gov>  
, ""Good.David@epamail.epa.gov""  
<Good.David@epamail.epa.gov>  
Subject  
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**To:** Verify Help Desk [Ex. 6] Thomas, Richard (EEO)"  
[Richard.Thomas@vw.com]  
**Cc:** David Good/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA[]; obert Peavyhouse/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 6/6/2012 5:03:14 PM  
**Subject:** RE: GTI index 022 (HLP-2623)

Hello [Ex. 6]  
Certificate Requests have been submitted for both test groups as requested:  
DAD XV02.03PA and  
DAD XV02.03UA

Bill Rodgers  
VWGoA  
248-754-4219

-----Original Message-----

**From:** [Ex. 6] On Behalf Of Verify Help Desk  
**Sent:** Wednesday, June 06, 2012 10:35 AM  
**To:** Thomas, Richard (EEO)  
**Cc:** 'Good.David@epamail.epa.gov'; 'Robert Peavyhouse (Peavyhouse.Robert@epamail.epa.gov)';  
Rodgers, William (EEO)  
**Subject:** RE: GTI index 022 (HLP-2623)

Hello Mr. Thomas,

Business rule TG-BR67 was returned for this submission because the owner of the carline VWX is different than the submitter's manufacturer code ADX.  
Because this is the case VWX must grant ADX permission to use a VWX carline.

For the VWX owner to grant permission for ADX to use its carline the VWX submitter must navigate to the Alternate Manufacturer tab of the Maintain Manufacturer Information module and make a submission granting ADX permission to do so.

Business rule TG-BR89 indicates that this Carline 212 is not in the system.  
Please check to be sure that an accepted carline submission was made for Carline 212.

After your test group submission is accepted a lock request should be made and the 'Yes' radio button should be selected for the 'Revised Certificate Needed' question. A comment can be added in the comment field about the 'Revised Certificate Needed' question indicating that a revised certificate is needed to certify VWX carlines for your general label submission.

I will also call you to discuss.

---

<TransactionStatusIdentifier>REJECTED</TransactionStatusIdentifier>  
<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the

carline.</TransactionMessageText>  
<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>  
<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>  
<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>  
<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>  
<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>  
<TransactionMessageText>TG-BR89 - The provided Carline Manufacturer Code (TG-300), Division Code (TG-301), Carline Code (TG-302), and Model Year (TG-6) must specify a carline that exists in the system. (Manufacturer Code: VWX, Division Code: 1, Carline Code: 212, Model Year: 2013)</TransactionMessageText>  
<TransactionMessageText>TG-BR89 - The provided Carline Manufacturer Code (TG-300), Division Code (TG-301), Carline Code (TG-302), and Model Year (TG-6) must specify a carline that exists in the system. (Manufacturer Code: VWX, Division Code: 1, Carline Code: 212, Model Year: 2013)</TransactionMessageText>  
</TransactionStatusDetails>

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

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"Thomas, Richard  
(EEO)"  
<Richard.Thomas@v To  
w.com> Verify Help Desk@CSC  
cc  
06/06/2012 07:12 ""Robert Peavyhouse  
AM (Peavyhouse.Robert@epamail.epa.gov)  
""  
<Peavyhouse.Robert@epamail.epa.gov>  
, ""Good.David@epamail.epa.gov""  
<Good.David@epamail.epa.gov>  
Subject  
RE: GTI index 022 (HLP-2623)

Hi **Ex. 6**

Please call me when you are available to talk a minute. Bill tried to enter this VWX division 1 carline 211 signed on as Audi, because it's an Audi test group, and it would not allow us to add this Volkswagen carline. The manufacturer code has to be Audi to add a carline to this Audi test group. This is the same type problem we have with the general label.

I must enter this Volkswagen model as a Volkswagen in order to create a Volkswagen label because the QR code is created as a Volkswagen VWX for Volkswagen models. If I signed on as Audi I am sure the label will run but the label will be created as Audi and then the QR code created will be wrong.

Now I have several model indexes with the same situation, Lamborghini within an Audi Test group. Audi models within a Volkswagen test group and Bentley models within an Audi test group.

Thanks,  
Richard ( 248 754 4213 )

-----Original Message-----

From: **Ex. 6** On Behalf Of Verify Help Desk  
Sent: Tuesday, June 05, 2012 7:11 PM  
To: Thomas, Richard (EEO)  
Subject: Re: GTI index 022 (HLP-2623)

Hello Mr. Thomas,

You newly created carline code 211 has to exist in Verify as a certified model. In order to certify this carline you will need to unlock your test group and then add this carline to your test group in the Certified Models section on the Evap/Stnds/Models tab (see screen shot below).

To unlock your test group navigate to MyCDX > Verify: Light Duty > Request Certificate and select Process Code "U=Unlock Request."

After you have unlocked your test group and added this carline to the test group you will need to request another certificate and have your cert rep issue it.

Please note that the information that you enter in your general label submission will have to match what you enter in the Certified Models section in your test group submission (i.e. Transmission Type, Transmission Lockup, Transition Creeper Gear, Total Number of Transition Gears, and Drive System).

Please let me know if you have any further questions.

## **Ex. 6**

(Embedded image moved to file: pic08624.gif)

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

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"Thomas, Richard

(EEO)"

<Richard.Thomas@v

w.com>

To

Verify Help Desk@CSC

cc

06/05/2012 12:55

PM

Subject

GTI index 022

Hello **Ex. 6**

We created carline 211 under VWX division 1 for the Volkswagen GTI and ran the label (index 022) again and got the following business rule messages.

To remind you, this model is certified in two Audi test groups. The information I put on the label input and at the Subconfiguration level are using ADX division 2 and the Audi test group names with associated sales numbers. If you would like to discuss please feel free to call me at, 248 754 4213.

Thanks,  
Richard

Transaction Identifier: \_9d6ac552-770c-4f0a-a0d5-69dc2a5642b5

#### Transaction Status Details

Transaction Status Identifier : REJECTED Transaction Message Text : GL-BR4

- The combination of Model Year (GL-3), Carline Manufacturer Code (GL-7), Division Code (GL-11) and Carline Code (GL-12) must exist in the system as a certified model.

Transaction Message Text : LD-FE-GL-BR98 - The combination of Carline Manufacturer Code (GL-10), Division Code (GL-11), and CarlineCode (GL-12) must exist at least once in the repeated subconfiguration sales information (GL-125.5, GL-125.6, and GL-125.7).

Transaction Message Text : LD-FE-GL-BR117 - The combination of Carline Manufacturer Code (GL-125.5), Division Code (GL-125.6), Carline Code (GL-125.7), Transmission Type (GL-67), Transmission Lockup (GL-69), Transmission Creeper Gear (GL-70), Total Number of Transmission Gears (GL-71), and Drive System (GL-72) must exist as a certified model in the Test Group dataset (TG) for the Test Group (GL-126). (Base Level IWC =

3500) (Config Index = 1) (SubConfig Index = 1) (Test Group (GL-126) = DAD XV02.03UA) (Carline Manufacturer Code (GL-125.5) = ADX) (Division Code (GL-125.6) = 2) (Carline Code (GL-125.7) = 211) Transaction Message Text :

LD-FE-GL-BR154 - Test Groups listed in the Unique Carline/Subconfiguration Test Groups (GL-207) must be certified and must have one Certified Model Carline the same as the Carline of the Model Type for this FE Label.

(SubConfiguration Test Group = DAD XV02.03UA) Transaction Message Text :

LD-FE-GL-BR117 - The combination of Carline Manufacturer Code (GL-125.5), Division Code (GL-125.6), Carline Code (GL-125.7), Transmission Type (GL-67), Transmission Lockup (GL-69), Transmission Creeper Gear (GL-70), Total Number of Transmission Gears (GL-71), and Drive System (GL-72) must exist as a certified model in the Test Group dataset (TG) for the Test Group (GL-126). (Base Level IWC =

3500) (Config Index = 2) (SubConfig Index = 1) (Test Group (GL-126) = DAD XV02.03PA) (Carline Manufacturer Code (GL-125.5) = ADX) (Division Code (GL-125.6) = 2) (Carline Code (GL-125.7) = 211) Transaction Message Text :

LD-FE-GL-BR153 - All of the unique Test Groups submitted in the Subconfiguration Sales Information (GL-126) that have the same Carline as the Model Type for this FE Label must be submitted as one of the Unique Carline/Subconfiguration Test Groups (GL-207).

(SubConfiguration Test Group = DAD XV02.03PA) Transaction Message Text :

LD-FE-GL-BR154 - Test Groups listed in the Unique Carline/Subconfiguration Test Groups (GL-207) must be certified and must have one Certified Model Carline the same as the Carline of the Model Type for this FE Label.

(SubConfiguration Test Group = DAD XV02.03UA)



**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** David Good/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;"Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; obert Peavyhouse/AA/USEPA/US@EPA;"Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; erify Help Desk [Ex. 6]  
**From:** [Ex. 6]  
**Sent:** Wed 6/6/2012 5:11:11 PM  
**Subject:** RE: GTI index 022 (HLP-2623)

Hello Mr. Rodgers and Mr. Thomas,

Your EPA Cert Rep will now need to issue the certificates in order for the carlines to be certified. Please contact your EPA Cert Rep and request that the certificates be issued.

## Ex. 6

Verify Help Desk  
Staffed by Computer Sciences Corporation,  
Contractor to the Environmental Protection Agency

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"Rodgers, William (EEO)"  
<William.Rodgers@vw.com> To  
[Ex. 6]@CSC, "Thomas, Richard (EEO)"  
06/06/2012 01:03 PM <Richard.Thomas@vw.com>  
cc  
"Good.David@epamail.epa.gov"  
<Good.David@epamail.epa.gov>,  
"Robert Peavyhouse (Peavyhouse.Robert@epamail.epa.gov)"  
"  
<Peavyhouse.Robert@epamail.epa.gov>  
Subject  
RE: GTI index 022 (HLP-2623)



Hello **Ex. 6**

Certificate Requests have been submitted for both test groups as requested:  
DADXV02.03PA and  
DADXV02.03UA

Bill Rodgers  
VWGoA  
248-754-4219

-----Original Message-----

From: **Ex. 6** On Behalf Of Verify Help  
Desk

Sent: Wednesday, June 06, 2012 10:35 AM  
To: Thomas, Richard (EEO)  
Cc: 'Good.David@epamail.epa.gov'; 'Robert Peavyhouse  
(Peavyhouse.Robert@epamail.epa.gov)'; Rodgers, William (EEO)  
Subject: RE: GTI index 022 (HLP-2623)

Hello Mr. Thomas,

Business rule TG-BR67 was returned for this submission because the owner of the carline VWX is different than the submitter's manufacturer code ADX. Because this is the case VWX must grant ADX permission to use a VWX carline.

For the VWX owner to grant permission for ADX to use its carline the VWX submitter must navigate to the Alternate Manufacturer tab of the Maintain Manufacturer Information module and make a submission granting ADX permission to do so.

Business rule TG-BR89 indicates that this Carline 212 is not in the system. Please check to be sure that an accepted carline submission was made for Carline 212.

After your test group submission is accepted a lock request should be made and the 'Yes' radio button should be selected for the 'Revised Certificate Needed' question. A comment can be added in the comment field about the 'Revised Certificate Needed' question indicating that a revised certificate is needed to certify VWX carlines for your general label submission.

I will also call you to discuss.

---

<TransactionStatusIdentifier>REJECTED</TransactionStatusIdentifier>

<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>

<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>

<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>

<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>

<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>

<TransactionMessageText>TG-BR67 - If the Manufacturer Code (TG-300) of the owner of the carline is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the carline.</TransactionMessageText>

<TransactionMessageText>TG-BR89 - The provided Carline Manufacturer Code (TG-300), Division Code (TG-301), Carline Code (TG-302), and Model Year (TG-6) must specify a carline that exists in the system. (Manufacturer Code: VWX, Division Code: 1, Carline Code: 212, Model Year: 2013)</TransactionMessageText>

<TransactionMessageText>TG-BR89 - The provided Carline Manufacturer Code (TG-300), Division Code (TG-301), Carline Code (TG-302), and Model Year (TG-6) must specify a carline that exists in the system. (Manufacturer Code: VWX, Division Code: 1, Carline Code: 212, Model Year: 2013)</TransactionMessageText>

</TransactionStatusDetails>

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the Environmental  
Protection Agency

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"Thomas, Richard  
(EEO)"  
<Richard.Thomas@v To  
w.com> [Ex. 6]@CSC  
cc  
06/06/2012 07:12 ""Robert Peavyhouse  
AM (Peavyhouse.Robert@epamail.epa.gov)  
""  
<Peavyhouse.Robert@epamail.epa.gov>  
, ""Good.David@epamail.epa.gov""  
<Good.David@epamail.epa.gov>  
Subject  
RE: GTI index 022 (HLP-2623)

Hi [Ex. 6]

Please call me when you are available to talk a minute. Bill tried to enter this VWX division 1 carline 211 signed on as Audi, because it's an Audi test group, and it would not allow us to add this Volkswagen carline. The manufacturer code has to be Audi to add a carline to this Audi test group. This is the same type problem we have with the general label.

I must enter this Volkswagen model as a Volkswagen in order to create a Volkswagen label because the QR code is created as a Volkswagen VWX for Volkswagen models. If I signed on as Audi I am sure the label will run but the label will be created as Audi and then the QR code created will be wrong.

Now I have several model indexes with the same situation, Lamborghini within an Audi Test group. Audi models within a Volkswagen test group and Bentley models within an Audi test group.

Thanks,  
Richard ( 248 754 4213 )

-----Original Message-----

From: **Ex. 6** On Behalf Of Verify Help Desk  
Sent: Tuesday, June 05, 2012 7:11 PM  
To: Thomas, Richard (EEO)  
Subject: Re: GTI index 022 (HLP-2623)

Hello Mr. Thomas,

You newly created carline code 211 has to exist in Verify as a certified model. In order to certify this carline you will need to unlock your test group and then add this carline to your test group in the Certified Models section on the Evap/Stnds/Models tab (see screen shot below).

To unlock your test group navigate to MyCDX > Verify: Light Duty > Request Certificate and select Process Code "U=Unlock Request."

After you have unlocked your test group and added this carline to the test group you will need to request another certificate and have your cert rep issue it.

Please note that the information that you enter in your general label submission will have to match what you enter in the Certified Models section in your test group submission (i.e. Transmission Type, Transmission Lockup, Transition Creeper Gear, Total Number of Transition Gears, and Drive System).

Please let me know if you have any further questions.

**Ex. 6**

(Embedded image moved to file: pic08624.gif)

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the Environmental  
Protection Agency

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"Thomas, Richard  
(EEO)"  
<Richard.Thomas@v To  
w.com> **Ex. 6** @CSC  
cc  
06/05/2012 12:55  
PM Subject  
GTI index 022

Hello **Ex. 6**

We created carline 211 under VWX division 1 for the Volkswagen GTI and ran the label (index 022) again and got the following business rule messages. To remind you, this model is certified in two Audi test groups. The information I put on the label input and at the Subconfiguration level are using ADX division 2 and the Audi test group names with associated sales numbers. If you would like to discuss please feel free to call me at, 248 754 4213.

Thanks,  
Richard

Transaction Identifier: \_9d6ac552-770c-4f0a-a0d5-69dc2a5642b5

Transaction Status Details

Transaction Status Identifier : REJECTED Transaction Message Text : GL-BR4  
- The combination of Model Year (GL-3), Carline Manufacturer Code (GL-7), Division Code (GL-11) and Carline Code (GL-12) must exist in the system as a certified model.

Transaction Message Text : LD-FE-GL-BR98 - The combination of Carline Manufacturer Code (GL-10), Division Code (GL-11), and CarlineCode (GL-12) must exist at least once in the repeated subconfiguration sales information (GL-125.5, GL-125.6, and GL-125.7).

Transaction Message Text : LD-FE-GL-BR117 - The combination of Carline Manufacturer Code (GL-125.5), Division Code (GL-125.6), Carline Code (GL-125.7), Transmission Type (GL-67), Transmission Lockup (GL-69), Transmission Creeper Gear (GL-70), Total Number of Transmission Gears (GL-71), and Drive System (GL-72) must exist as a certified model in the Test Group dataset (TG) for the Test Group (GL-126). (Base Level IWC = 3500) (Config Index = 1) (SubConfig Index = 1) (Test Group (GL-126) = DAD XV02.03UA) (Carline Manufacturer Code (GL-125.5) = ADX) (Division Code (GL-125.6) = 2) (Carline Code (GL-125.7) = 211) Transaction Message Text : LD-FE-GL-BR154 - Test Groups listed in the Unique Carline/Subconfiguration Test Groups (GL-207) must be certified and must have one Certified Model Carline the same as the Carline of the Model Type for this FE Label. (SubConfiguration Test Group = DAD XV02.03UA) Transaction Message Text : LD-FE-GL-BR117 - The combination of Carline Manufacturer Code (GL-125.5), Division Code (GL-125.6), Carline Code (GL-125.7), Transmission Type (GL-67), Transmission Lockup (GL-69), Transmission Creeper Gear (GL-70), Total Number of Transmission Gears (GL-71), and Drive System (GL-72) must exist as a certified model in the Test Group dataset (TG) for the Test Group (GL-126). (Base Level IWC = 3500) (Config Index = 2) (SubConfig Index = 1) (Test Group (GL-126) = DAD XV02.03PA) (Carline Manufacturer Code (GL-125.5) = ADX) (Division Code (GL-125.6) = 2) (Carline Code (GL-125.7) = 211) Transaction Message Text : LD-FE-GL-BR153 - All of the unique Test Groups submitted in the Subconfiguration Sales Information (GL-126) that have the same Carline as the Model Type for this FE Label must be submitted as one of the Unique Carline/Subconfiguration Test Groups (GL-207). (SubConfiguration Test Group = DAD XV02.03PA) Transaction Message Text : LD-FE-GL-BR154 - Test Groups listed in the Unique Carline/Subconfiguration Test Groups (GL-207) must be certified and must have one Certified Model Carline the same as the Carline of the Model Type for this FE Label. (SubConfiguration Test Group = DAD XV02.03UA)

**To:** David Good/AA/USEPA/US@EPA[]  
**From:** postmaster@volkswagen.de  
**Sent:** Mon 6/11/2012 5:05:49 PM  
**Subject:** [Possible VIRUS!] Delivery Status Notification (Failure)  
<http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>

WARNING: This message contains attachments that the virus scanner was unable to scan. Open at your own risk or call the Helpdesk for assistance.  
WARNING!!! (from amgwyot02.vwoa.na.vwg)

The following message attachments were flagged by the antivirus scanner:

Attachment [2.3.2.2] VW-PreMY Rpt-CBI\_DVWXV\_COMMON\_CR1\_CAR\_R02[1]-from Verify-4-20-2012.zip, scan failed: File encrypted. Action taken: incomplete scan

Please contact the Help Desk at x44800 with any questions.

WARNING: This message contains attachments that the virus scanner was unable to scan. Open at your own risk or call the Helpdesk for assistance.

This is an automatically generated Delivery Status Notification.

Delivery to the following recipients failed.

**Ex. 7** @vw.com

Received: from mailgate1.vw.com ([10.136.103.246]) by vwoaahsxb100.vwoa.na.vwg with Microsoft SMTPSVC(6.0.3790.4675); Mon, 11 Jun 2012 13:05:48 -0400  
Received: from localhost (localhost [127.0.0.1]) by amgwyin01.vwoa.na.vwg (MOS 4.3.4-GA) id IIO60280; Mon, 11 Jun 2012 13:05:48 -0400 (EDT)  
Received: from mblast03.pyd.epa.gov (mblast03.pyd.epa.gov [161.80.134.170]) by amgwyin01.vwoa.na.vwg (MOS 4.3.4-GA) with ESMTP id IIO60208; Mon, 11 Jun 2012 13:05:37 -0400  
Received: from mblast03.pyd.epa.gov (localhost.localdomain [127.0.0.1]) by localhost (Postfix) with SMTP id 7A151D7C9E3; Mon, 11 Jun 2012 12:58:19 -0400 (EDT)  
Received: from mintra03.pyd.epa.gov (mintra03.pyd.epa.gov [161.80.134.169]) by mblast03.pyd.epa.gov (Postfix) with ESMTP id 4BAAAD7CA3B; Mon, 11 Jun 2012 12:58:19 -0400 (EDT)  
Received: from mintra03.pyd.epa.gov (localhost.localdomain [127.0.0.1]) by localhost (Postfix) with SMTP id 32B347A82D6; Mon, 11 Jun 2012 12:58:19 -0400 (EDT)  
Received: from w1818tdcgu113.aa.ad.epa.gov (w1818tdcgu113.aa.ad.epa.gov [161.80.134.171]) by mintra03.pyd.epa.gov (Postfix) with ESMTP id F16327A82CB; Mon, 11 Jun 2012 12:58:18 -0400 (EDT)  
Subject: 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors  
To: oliver-schmidt@vw.com  
Cc: Roberts French <French.Roberts@epamail.epa.gov>, Tom Anderson <Anderson.Tom@epamail.epa.gov>, Linc Wehrly <>Wehrly.Linc@epamail.epa.gov>, **Ex. 7** @vw.com  
Message-ID: <OF8B9C8F4B.4AD534F6-ON85257A17.0077F47F-85257A1A.005D383F@epamail.epa.gov>  
From: David Good <Good.David@epamail.epa.gov>  
Date: Mon, 11 Jun 2012 12:58:12 -0400  
Content-Type: multipart/mixed; boundary="MIRAPPOINT\_PART1\_4fd62563"  
X-KeepSent: 8B9C8F4B:4AD534F6-85257A17:0077F47F; type=4; name=\$KeepSent

X-Mailer: Lotus Notes Release 8.5.2FP3 July 11, 2011  
X-MIMETrack: Serialize by Router on EPAHUB13/USEPA/US(Release 8.5.2FP2|March 22, 2011) at 06/11/2012 12:58:18 PM  
MIME-Version: 1.0  
X-Mirapoint-Virus-ScanFailure: SCANFAILURE; host=amgwyin01.vwoa.na.vwg; attachment=[2.2]; virus=File encrypted  
X-Junkmail-Status: score=10/48, host=amgwyin01.vwoa.na.vwg  
X-Junkmail-Signature-Raw: score=unknown, refid=str=0001.0A02020B.4FD62563.0124,ss=1,re=0.000,vtr=str,vl=0,fgs=0, ip=161.80.134.170, so=2011-11-01 07:33:11, dmn=2011-05-27 18:58:46, mode=single engine  
X-Junkmail-IWF: false  
X-Mirapoint-Loop-Id: 2e45e024428507712557a27c7c0e9567  
Return-Path: Good.David@epamail.epa.gov  
X-OriginalArrivalTime: 11 Jun 2012 17:05:48.0623 (UTC) FILETIME=[72BD8DF0:01CD47F4]

WARNING!!! (from amgwyin01.vwoa.na.vwg)

The following message attachments were flagged by the antivirus scanner:

Attachment [2.2] VW-PreMY Rpt-CBI\_DVWXV\_COMMON\_CR1\_CAR\_R02[1]-from Verify-4-20-2012.zip, scan failed: File encrypted. Action taken: incomplete scan

Please contact the Help Desk at x44800 with any questions.

WARNING: This message contains attachments that the virus scanner was unable to scan. Open at your own risk or call the Helpdesk for assistance.

Oliver & Len,

I have some questions about Volkswagen's 2013 GHG Pre-Model year Report.

First of all, thanks for using the EPA templates. It makes it easy for me to review your Pre-MY report information.

1. Potential error in your fleet average calculations: Using the projected CREE fleet average estimates and CREE standards listed in your (attached) 2013 Pre-MY report spreadsheet, I come up with slightly different results for the total "Model Year Credits (Debits)" fields for car and trucks for 2012-2015 model years. For example, my calculations for 2013-2015 model year result in the following credit (Megagram) values:

Category	D.Good CREE Calcs	VW CREE values	Comments
2013 Pass Car	(730,335)	(778,903)	
2013 Light Truck 87,527		87,527	agrees with VW
2014 Pass Car	(79,674)	(91,543)	
2014 Light Truck (16,902)		(17,244)	
2015 Pass Car	(424,806)	(395,074)	
2015 Light Truck (272,380)		(275,812)	

My calculations, for example, for 2013 cars are  $[(258 - 269)(550,837)(195,264)/1,000,000] - 404,242$  (A/C credits) = 778,903 credits. It looks like your calculations are not rounding the CREE standards and fleet average CREE values to the nearest whole gram/mile, as required by EPA regulations.



Please advise.

# Ex. 4 - CBI

Please advise.

3. Bugatti: Bugati models appear to be missing in your 2013-2015 templates.

Please advise

4. Three AB&T Spreadsheets: Your report contains three AB&T spreadsheets. None of them include projections for 2014 or 2015 model year credits. Please combine the three spreadsheets into one AB&T spreadsheet which includes a listing for 2014 and 2015 credits.

Please advise.

5. A/C Leakage and Efficiency Credits: Your 2013 Pre-MY report doesn't contain any details of how the A/C credits were generated for each model. Please provide a little more detail about how the A/C leakage and A/C efficiency credits will be generated for 2012 and 2013 model year vehicles, and (if possible) 2014 and 2015 model year vehicles---similar to the level of detail provided in the EPA templates available at <http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>.

Please advise.

6. Possible Merger of VW and Porsche: Over the past year, there have been some articles in the press about a potential merger of VW & Porsche. If possible, please provide a brief summary of the status of that possible merger and any potential effects on VW's 2013 GHG compliance plans.

In summary, please email us the answers to my questions and send us a corrected 2013 PreMY Report (if needed) as soon as practicable. If you like, we will be glad to schedule a conference call at your convenience to discuss these questions and the potential errors.

Note: I encrypted the attached files using the same password as I used last year when I sent Richard Thomas for the 2013 FE label spreadsheets. I'll call you with the password, just in case you need it.

Thanks

(See attached file: VW-PreMY Rpt-CBI\_DVWXV\_COMMON\_CR1\_CAR\_R02[1]-from Verify-4-20-2012.zip)

WARNING: This message contains attachments that the virus scanner was unable to scan. Open at your own risk or call the Helpdesk for assistance.

WARNING: The virus scanner was unable to scan the next attachment. This attachment could possibly contain viruses or other malicious programs. The attachment could not be

scanned for the following reasons:

The file was encrypted

You are advised NOT to open this attachment unless you are completely sure of its contents. If in doubt, please contact your system administrator.

The identifier for this message is '4FD62571\_31915\_2938\_1'.

EPA Postmaster

EPA PM Admin <EPA\_PM\_Admin@epamail.epa.gov>

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*

This Email message contained an attachment named VW-PreMY Rpt-CBI\_DVWXV\_COMMON\_CR1\_CAR\_R02[1]-from Verify-4-20-2012.zip which may be a computer program. This attached computer program could contain a computer virus which could cause harm to EPA's computers, network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced into the EPA network. EPA is deleting all computer program attachments sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you should contact the sender and request that they rename the file name extension and resend the Email with the renamed attachment. After receiving the revised Email, containing the renamed attachment, you can rename the file extension to its correct name.

For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900.

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*

**To:** CN=David Good/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** [Ex. 7]@vw.com]; [Ex. 7]  
 [Ex. 7]@vw.com]  
**Bcc:** []  
**From:** [Ex. 7]  
**Sent:** Fri 6/15/2012 2:29:06 PM  
**Subject:** RE: 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors

[attachment "winmail.dat" deleted by David Good/AA/USEPA/US]  
 [attachment "2013 Pre MY Report.pdf" deleted by David Good/AA/USEPA/US]  
 [attachment "message\_body.rtf" deleted by David Good/AA/USEPA/US]  
 Dave

Attached are updated documents that address the issues identified within you most recent email. In addition I have included responses to the each of the identified issues in red below. Furthermore a statement has been included that address the uncertainty associated with Porsche. Please let me know if there are any additional questions. Thanks!

1. Potential error in your fleet average calculations: Using the projected CREE fleet average estimates and CREE standards listed in your (attached) 2013 Pre-MY report spreadsheet, I come up with slightly different results for the total "Model Year Credits (Debits)" fields for car and trucks for 2012-2015 model years. For example, my calculations for 2013-2015 model year result in the following credit (Megagram) values:

Category	D.Good CREE Calcs	VW CREE values	Comments
2013 Pass Car	(730,335)	(778,903)	
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agrees with VW			
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Please advise.

Attached are updated documents where CREE Fleet Average estimates have been corrected by using the appropriate rounding technique.

2. Standards Calculator - Potential error in projected production volume: The projected production volume values listed in the 2013-2015 Standards calculator spreadsheets don't agree with the projected production volume listed in the 2013-2015 fleet average spreadsheets. For example the 2013 car production volume is listed as 565,654 in the 2013 car standards calculator but 550,837 in the 2013 car fleet average spreadsheet. Also, please note that a standards calculator spreadsheet was not included in your Pre-MY report for 2013 model year trucks.

Please advise.

EPA Calculator documents have been updated to correct errors in projected planning volumes. Planning volumes are now aligned throughout the report MY 2013 – 2015.

3. Bugatti: Bugati models appear to be missing in your 2013-2015 templates.

Please advise

Bugatti planning volumes not available.

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Please advise.

AB&T spreadsheet has been updated with MY 2013 – 2015 appearing on 1 spreadsheet as requested.

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Support documentation has been provided that demonstrates how credits were generated for each model.

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"On September 8, 2011, Volkswagen AG announced that the planned merger with Porsche Automobile Holding SE (Porsche SE) cannot be implemented within the time frame laid down in the Comprehensive Agreement. The decision was reached by the Board of Management of Volkswagen AG following discussions with Porsche SE. Nevertheless, all parties remain committed to the goal of creating an integrated automotive group with Porsche and are convinced that they will succeed in doing so.

The existing legal hurdles, and particularly those resulting from the ongoing proceedings and actions against Porsche SE in Germany and the USA due to alleged market manipulation, made it impossible from Volkswagen's perspective to quantify the economic risks and hence to arrive at a valuation for Porsche SE that could be used to determine the exchange ratio.

Over the past months, Volkswagen AG and Porsche SE have conducted in-depth examinations of whether there are other possibilities, in addition to the put/call options contained in the Comprehensive Agreement, that can be implemented by all parties involved in order to achieve the goal of creating the integrated automotive group with Porsche [AG, the operating business,] on economically feasible terms [earlier than 2014]. These examinations are still ongoing."

# Ex. 7

-----Original Message-----

From: David Good [mailto:Good.David@epamail.epa.gov]

Sent: Monday, June 11, 2012 12:58 PM

To: **Ex. 7**@vw.com

Cc: Roberts French; Tom Anderson; Linc Wehrly; **Ex. 7** **Ex. 7**

Subject: 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors

WARNING!!! (from amgwyin01.vwoa.na.vwg)

The following message attachments were flagged by the antivirus scanner:

Attachment [2.2] VW-PreMY Rpt-CBI\_DVWXV\_COMMON\_CR1\_CAR\_R02[1]-from Verify-4-20-2012.zip, scan failed:  
File encrypted. Action taken: incomplete scan

Please contact the Help Desk at x44800 with any questions.

**To:** CN=David Good/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** [Ex. 7]@vw.com]; [Ex. 7] (EEO)"  
 [Ex. 7]@vw.com]  
**Bcc:** []  
**From:** [Ex. 7]  
**Sent:** Mon 6/18/2012 2:05:57 PM  
**Subject:** RE: 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors - Revised 6/18/2012

[attachment "winmail.dat" deleted by David Good/AA/USEPA/US]  
 [attachment "message\_body.rtf" deleted by David Good/AA/USEPA/US]  
 [attachment "2013 Pre MY Report.pdf" deleted by David Good/AA/USEPA/US]  
 Dave

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**Ex. 7**



**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 6/27/2012 1:34:59 PM  
**Subject:** RE: 2013 FE Guide - VW Group data attached

Hi Dave;

I reprocessed four labels indexes: 37, 38, 39 and 70, for the 2.0L Audi models, it was my transposing of the Gas Guzzler MPG and the adjusted combined model type fuel consumption entry fields. Should be no errors now.

The other EPA comments have to do with the relabeling of the A8 and A8L, index 128 and 129, model types due to an addition to the base level with the addition of a model running change and with our letter of June 27, 2012 and revision to the application. The A7 quattro (index # 076) and A6 quattro were added to the test group. The A7 quattro is in the same base level as the A8 and A8L with this engine and transmission combination. This resulted in a slight improvement to the city value only, for the A8 and A8L to 18 MPG from 17 MPG. The release date in Verify is correct at June 22, 2012.

If you have any questions, or suggestion please let me know.

Thanks,

Richard

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Monday, June 25, 2012 5:15 PM  
To: Thomas, Richard (EEO)  
Subject: 2013 FE Guide - VW Group data attached

Richard,

Here's the 2013 data in Verify as of 6/25/2012 10AM or so. I didn't check it over with a fine tooth comb, but the macro came up with a few errors

Dave

(See attached file: VW Group - 2013 FE Guide-rel10-all rel dates-no-sales-6-25-2012.xlsx)

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** [Ex. 7]vw.com]; im  
Snyder/AA/USEPA/US@EPA; Roberts French/AA/USEPA/US@EPA; [Ex. 7]  
[Ex. 7]vw.com]; Roberts French/AA/USEPA/US@EPA; [Ex. 7]  
[Ex. 7]@vw.com]; [Ex. 7]@vw.com]  
**From:** [Ex. 7]  
**Sent:** Thur 7/5/2012 12:27:33 PM  
**Subject:** RE: 2013 FE Guide Errors in Verify; Many errors when calculating adjusted combined fuel consumption(gal/100 miles); Request to update any 2013 Labels submitted before May 11, 2012  
[www.fueleconomy.gov](http://www.fueleconomy.gov)

Hi Dave;

Hope you had a nice fourth. I have updated all the 2013 labels that were processed before the May 11th Verify release 10 date. There were thirteen Volkswagen labels. I have also corrected the typo on the city CO2 value on label index # 52. If you want to run your audit again, and send me the results I will check it out.

Best regards,

Richard

**From:** David Good [mailto:Good.David@epamail.epa.gov]  
**Sent:** Tuesday, July 03, 2012 12:11 PM  
**To:** [Ex. 7]  
**Cc:** [Ex. 7]; Jim Snyder; Roberts French  
**Subject:** re: 2013 FE Guide Errors in Verify; Many errors when calculating adjusted combined fuel consumption(gal/100 miles); Request to update any 2013 Labels submitted before May 11, 2012

Richard,

As we discussed over the phone yesterday---you were one of the few manufacturers who calculated fuel consumption correctly---good Job!

Dave

1. Errors in Verify: Attached is a spreadsheet with the 2013 FE Label errors in Verify as of June 29, 2012. The spreadsheet contains all the 2013 FE Label data in Verify as of June 29, 2012 including some of the new Release 10 fields (columns 141-184). Color coding is explained in the heading for each column, except for the various shades of green. Labels with errors are highlighted in green fill in the first few columns or almost all columns---with the field where the error occurred highlighted in yellow fill. [Normal Green (not pea green) means the error occurred in the Combined Adjusted Fuel Consumption (gal/100 miles) field.]

When you get a chance, please correct the errors--so I can forward the corrected data to DOE for posting on the web on the 1st and 15th of each month.

2. Errors in Combined Adjusted Fuel Consumption: I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption" (column 165 of the attached spreadsheet). EPA calculated fuel consumption is in column 166. Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some manufacturers are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as prominently displayed on 2013 labels (window stickers)---as explained in more detail in Item 3, below.

When you get a chance, please correct the fuel consumption errors in Verify. [Note that I'm not currently sending fuel consumption values to DOE for posting on the web, so I don't need the fuel consumption errors corrected immediately. Please correct them as soon as possible, but if you need 2-3 weeks to correct them, that's OK with me.]

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

3. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

4. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at [www.fueleconomy.gov](http://www.fueleconomy.gov) to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. For this reason, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

If possible, please try to update those labels before August 6, 2012. Please call or email me if you need more time to update your labels.

Thanks

(See attached file: VW\_Group\_2013 FEGuide1-all rel dates-no-sales-06-29-2012 PLUS new Rel10 fields.xlsx)

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**From:** [REDACTED] Ex. 7  
**Sent:** Wed 7/18/2012 4:16:08 PM  
**Subject:** Bentley Flexible Fueled Models and Driving Range  
[winmail.dat](#)

Hi Dave;

As we discussed on the phone, the miles on a tank values were missing on the fuel economy guide web site for the four 6.0L Bentley flexible fueled (E85) Continental models. They are the Continental GT, Continental GTC, Continental Flying Spur and the Continental Supersports Convertible. The fuel tank volume for these models is 23.8 US gallons. I understand from our discussion that the miles on a tank is not the same value we calculate per the requirements and that must appear on the fuel economy label for each of the fuels (gasoline and E85) on a flexible fueled model.

I noticed that many of the Audi gasoline and Diesel fueled models have a value for the "miles on a tank", however none of the Volkswagen models have this listed. If possible, we would like to see the "miles on a tank" on these high volume, fuel efficient Volkswagen models as well.

Thanks,  
Richard

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Thanks,

Richard

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Gibson, Robert C." [gibsonrc@ornl.gov]; richard.thomas@vw.com"  
[richard.thomas@vw.com]; oberts French/AA/USEPA/US@EPA;"Li, Jia" [lij1@ornl.gov];  
Li, Jia" [lij1@ornl.gov]  
**From:** "Hopson, Janet L."  
**Sent:** Thur 7/19/2012 11:57:56 AM  
**Subject:** RE: Bentley Flexible Fueled Models and Driving Range  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)

Dave, Richard:

As you know the tank size is not from the EPA dataset, but something we add here at ORNL. Generally we use a dataset provided by Edmunds. If we don't find it in the Edmunds data we look it up on the manufacture's Web site. Since that is a manual process it can take a while for us to gather the information for each new model year. We're always happy to take data straight from the manufacturer so will use the value provided by Richard below for the Bentleys. We'd also be happy to add data for the VWs if Richard would like to provide it.

As to how we calculate miles on a tank... We have always calculated the miles on a tank for gasoline, diesel, E85, etc. by assuming you will refuel when there is 10% of the fuel left in the tank so our value has never matched the official EPA range for alternative fuel vehicles. I think this is on the agenda for next week's call.

Thanks,

Janet

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Wednesday, July 18, 2012 5:46 PM  
To: Hopson, Janet L.  
Cc: Gibson, Robert C.; richard.thomas@vw.com; Roberts French  
Subject: Fw: Bentley Flexible Fueled Models and Driving Range

Janet,

VW was wondering about the "miles on a tankful" information on the website.

Please advise---when you get a chance, especially about the VW models.

I'm thinking that very few Bentley customers are interested in the fuel economy (or miles on a tankful)---but the press use the site for background information (which eventually gets out to the public). It's probably a different story for VW customers.

Dave

----- Forwarded by David Good/AA/USEPA/US on 07/18/2012 05:38 PM -----

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Cc: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
Date: 07/18/2012 12:16 PM  
Subject: Bentley Flexible Fueled Models and Driving Range

Hi Dave;

As we discussed on the phone, the miles on a tank values were missing on the fuel economy guide web site for the four 6.0L Bentley flexible fueled (E85) Continental models. They are the Continental GT, Continental GTC, Continental Flying Spur and the Continental Supersports Convertible. The fuel tank volume for these models is 23.8 US gallons. I understand from our discussion that the miles on a tank is not the same value we calculate per the requirements and that must appear on the fuel economy label for each of the fuels (gasoline and E85) on a flexible fueled model.

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[attachment "winmail.dat" deleted by David Good/AA/USEPA/US]



**To:** "Hopson, Janet L." [hopsonjl@ornl.gov]; avid Good/AA/USEPA/US@EPA[]  
**Cc:** "Gibson, Robert C." [gibsonrc@ornl.gov]; oberts French/AA/USEPA/US@EPA;"Li, Jia" [lij1@ornl.gov]; Li, Jia" [lij1@ornl.gov]  
**From:** Ex. 7  
**Sent:** Fri 7/20/2012 10:15:26 AM  
**Subject:** RE: Bentley Flexible Fueled Models and Driving Range  
[VW MY13 Fuel Tank Capacities.xlsx](#)  
[VW MY13 Fuel Tank Capacities.pdf](#)  
[\[mailto:Good.David@epamail.epa.gov\]](mailto:Good.David@epamail.epa.gov)  
Ex. 7 @vw.com  
Ex. 7 @vw.com  
Ex. 7

Hello Janet;

We are happy to provide the fuel tank volumes for our Volkswagen models, please see the attached listing. If there is anything else you need for the Volkswagen Group brands please let me know.

Best regards,

Ex. 7

Ex. 7

**From:** Hopson, Janet L. [mailto:hopsonjl@ornl.gov]  
**Sent:** Thursday, July 19, 2012 7:58 AM  
**To:** David Good  
**Cc:** Gibson, Robert C.; Ex. 7; Roberts French; Li, Jia  
**Subject:** RE: Bentley Flexible Fueled Models and Driving Range

Dave, Richard:

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I'm thinking that very few Bentley customers are interested in the fuel economy (or miles on a tankful)---but the press use the site for background information (which eventually gets out to the public). It's probably a different story for VW customers.

Dave

----- Forwarded by David Good/AA/USEPA/US on 07/18/2012 05:38 PM -----

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Cc: [Ex. 7]@vw.com>

Date: 07/18/2012 12:16 PM  
Subject: Bentley Flexible Fueled Models and Driving Range

Hi Dave;

As we discussed on the phone, the miles on a tank values were missing on the fuel economy guide web site for the four 6.0L Bentley flexible fueled (E85) Continental models. They are the Continental GT, Continental GTC, Continental Flying Spur and the Continental Supersports Convertible. The fuel tank volume for these models is 23.8 US gallons. I understand from our discussion that the miles on a tank is not the same value we calculate per the requirements and that must appear on the fuel economy label for each of the fuels (gasoline and E85) on a flexible fueled model.

I noticed that many of the Audi gasoline and Diesel fueled models have a value for the "miles on a tank", however none of the Volkswagen models have this listed. If possible, we would like to see the "miles on a tank" on these high volume, fuel efficient Volkswagen models as well.

Thanks,  
Richard  
[attachment "winmail.dat" deleted by David Good/AA/USEPA/US]

**To:** "richard.thomas@vw.com" [richard.thomas@vw.com]  
**Cc:** CN=David Good/OU=AA/O=USEPA/C=US@EPA;"Boundy, Robert Gary" [boundyrg@ornl.gov]; Boundy, Robert Gary" [boundyrg@ornl.gov]  
**Bcc:** []  
**From:** "Hopson, Janet L."  
**Sent:** Tue 7/31/2012 2:44:30 PM  
**Subject:** FW: 2013 Audi RS5 image  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

[attachment "RS 5.jpg" deleted by David Good/AA/USEPA/US]  
Richard:

We'll fix this. If there are any other photos you would like us to use, please send them to Bob Boundy (he is cc'd here)

Thanks!

Janet

From: Thomas, Richard (EEO) [mailto:Richard.Thomas@vw.com]  
Sent: Tuesday, July 31, 2012 10:40 AM  
To: 'Good.David@epamail.epa.gov'  
Cc: Hopson, Janet L.  
Subject: 2013 Audi RS5 image

Hello Dave and Janet;

The image that appears on the fuel economy guide online for the 2013 Audi RS5 is incorrect. Please find the proper image attached for the Audi RS5. If you have any questions or the image is not sufficient let me know.

Thanks,  
Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Johnson, Stuart (EEO)"  
**Sent:** Mon 8/6/2012 5:08:29 PM  
**Subject:** VW Porsche Aggregation Meeting

Hello Dave,

Good to talk to you today. I wanted to confirm a meeting with EPA on Thursday August 9th @ 3:30 pm to discuss the implications of the merger of VW and Porsche. We would like to discuss all aspects of the merger as it pertains to regulatory requirements but in particular we would like to discuss the merger with regards timing of aggregating for the GHG regulation. When we review the regulation there seems to be uncertainty regarding when VW and Porsche will have to merge their fleets.

Thank you and looking forward to the discussion this Thursday.

Best Regards,

Stuart

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Linc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Johnson, Stuart (EEO)"  
**Sent:** Tue 8/7/2012 4:33:53 PM  
**Subject:** RE: VW Porsche Aggregation Meeting - Thurs (8/9/12) at 3:30 PM  
[image001.gif](#)

Hello Dave,

Got the invitation and thanks for setting up the meeting. For future reference my phone number is 248-754-4208.

See you on Thursday and best regards.

Stu

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Tuesday, August 07, 2012 12:14 PM  
To: Johnson, Stuart (EEO)  
Cc: Linc Wehrly; Jim Snyder  
Subject: Re: VW Porsche Aggregation Meeting - Thurs (8/9/12) at 3:30 PM

Stuart,

I included you, Len and Oliver when I scheduled the Thurs 3:30 meeting---didn't know exactly who would be coming. Please let me know if you think you'll need more than 1.5 hours.

[I invited some of our new engineers---and cc'd a few EPA folks that I don't expect will need to come.]

If possible, please send use the presentation or a one-pager ahead of time.

Also, for some reason I don't have your phone number.

See you Thursday.

Dave

"Johnson, Stuart (EEO)" ---08/06/2012 01:08:44 PM---Hello Dave, Good to talk to you today. I wanted to confirm a meeting with EPA on Thursday August 9t

From: "Johnson, Stuart (EEO)" <Stuart.Johnson@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Date: 08/06/2012 01:08 PM  
Subject: VW Porsche Aggregation Meeting

Hello Dave,

Good to talk to you today. I wanted to confirm a meeting with EPA on Thursday August 9th @ 3:30 pm to discuss the implications of the merger of VW and Porsche. We would like to discuss all aspects of the merger as it pertains to regulatory requirements but in particular we would like to discuss the merger with regards timing of aggregating for the GHG regulation. When we review the regulation there seems to be uncertainty regarding when VW and Porsche will have to merge their fleets.

Thank you and looking forward to the discussion this Thursday.

Best Regards,

Stuart

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 8/22/2012 6:22:55 PM  
**Subject:** 2013 Fuel Economy Guide FFV Placeholder  
[winmail.dat](#)  
[2013 EPA placeholder.xlsx](#)

Hello Dave;

Please see the attached spreadsheet with the fuel economy guide placeholder for 2013 Audi and Bentley FFV models. If you have any questions please feel free to call.

Thanks,  
Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com



[2013 EPA placeholder.xlsx](#)

Hello Dave;

Please see the attached spreadsheet with the fuel economy guide placeholder for 2013 Audi and Bentley FFV models. If you have any questions please feel free to call.

Thanks,

Richard

*Richard E. Thomas*

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Fax: 248 754-4207

[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; im Snyder/AA/USEPA/US@EPA; Aaron Hula/AA/USEPA/US@EPA[]; aron Hula/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Mon 9/17/2012 1:58:23 PM  
**Subject:** RE: Question about your 2011 CAFE report  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)  
[\[mailto:Good.David@epamail.epa.gov\]](mailto:Good.David@epamail.epa.gov)

Hi Dave;

As we discussed on the phone today, the 2011 Volkswagen Tiguan (2WD) is classified as a truck under the section of 523.5 (a) (5) Permit expanded use of the automobile for cargo-carrying purposes or other nonpassenger-carrying purposes through:

(i) For non-passenger automobiles manufactured prior to model year 2012, the removal of seats by means installed for that purpose by the automobile's manufacturer or with simple tools, such as screwdrivers and wrenches, so as to create a flat, floor level, surface extending from the forward most point of installation of those seats to the rear of the automobile's interior; or.....

This vehicle has the capability to easily remove the second row of seats as it is described in the vehicle owner's manual.

Best regards,

Richard

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Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Friday, September 14, 2012 5:21 PM  
To: Thomas, Richard (EEO)  
Cc: Kata, Leonard (EEO); Schmidt, Oliver (EEO); Jim Snyder; Aaron Hula

Subject: re: Question about your 2011 CAFE report

Richard,

We are beginning our review of your 2011 CAFE report and data submittal. The EPA folks who publish the EPA CO2 & Fuel Economy Trends report have asked me why the following vehicles are included in your 2011 Truck CAFE Report (in Verify):

Tiguan (2WD)

As you know, beginning with 2011 CAFE reports, NHTSA regulations & policy requires 2WD SUVs equal to or less than 6000 lbs GVWR will be included in your passenger car CAFE, ref 74 FR 14419, March 30, 2009.

Please let us know as soon as you get a chance. We could use a quick response, if possible, as the 2012 FE Trends report is fast approaching their printing deadline.

Thanks

**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Tue 9/18/2012 6:38:04 PM  
**Subject:** RE: 2013 FE Guide - Verify data attached

Looks okay to me, Dave. Thanks

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Monday, September 17, 2012 3:29 PM  
To: Thomas, Richard (EEO)  
Subject: 2013 FE Guide - Verify data attached

Richard,

Here's the data as of about 2PM today. The Q5 labels seemed OK to me.

Let me know if you see any errors that need correction.

(See attached file: VW\_Group\_2013 FEGuide-all rel dates-no-sales-9-17-2012.xlsx)

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** Roberts French/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA[]  
**From:** "Hopson, Janet L."  
**Sent:** Fri 10/5/2012 2:58:42 PM  
**Subject:** RE: Release Dates and Guide Web Site  
<mailto:hopsonjl@ornl.gov>  
[\[mailto:Richard.Thomas@vw.com\]](mailto:Richard.Thomas@vw.com)  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

Richard:

That Jetta Hybrid is in the printed guide data set. I don't think the guide would be mailed out until after November 19. Please let Dave know if you want it removed.

Janet

From: Thomas, Richard (EEO) [mailto:Richard.Thomas@vw.com]  
Sent: Friday, October 05, 2012 10:48 AM  
To: Hopson, Janet L.  
Cc: Roberts French  
Subject: RE: Release Dates and Guide Web Site

Hi Janet;

Thanks for getting back to me so quickly. I just want to verify that 2013 label index 100, the Jetta Hybrid carline is not made public yet. I can check with Dave on Tuesday to see if the Jetta Hybrid was sent in August for the printed guide, I don't think it was.

From: Hopson, Janet L. [mailto:hopsonjl@ornl.gov]  
Sent: Friday, October 05, 2012 10:38 AM  
To: Thomas, Richard (EEO)  
Cc: Roberts French  
Subject: RE: Release Dates and Guide Web Site

Richard:

Dave sends us data updates for the Web site ~ every two weeks. The updates only include vehicles which are past their release date. The most recent 2013 file had vehicles with release dates <9/20. I do not yet have an October data set, but I expect one any day now.

For the printed guide, we have a number of vehicles that are not yet posted on the Web site. The printed guide will be printed and distributed sometime between mid-November and December. I believe Dave sends us everything that was in the VERIFY system at the end of August.

If you want me to look for a specific vehicle, let me know. I do not have access to the VERIFY system, but can review the files we have received "to date".

Janet

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Has he sent you the early October labels, I think it may have been October 3rd?

I just want to confirm that one of our labels which is in Verify with a release date of November 19, 2012 will not yet appear in the guide. That is, we do not want it released or posted yet.

Thanks,

Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Fri 10/5/2012 6:24:08 PM  
**Subject:** FW: Release Dates and Guide Web Site  
[winmail.dat](#)

Hi Dave;

Can we discuss when you are in Tuesday?

Thanks,  
Richard

From: Hopson, Janet L. [mailto:hopsonjl@ornl.gov]  
Sent: Friday, October 05, 2012 10:59 AM  
To: Thomas, Richard (EEO)  
Cc: Roberts French; David Good  
Subject: RE: Release Dates and Guide Web Site

Richard:

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3800 Hamlin Road  
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Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Roberts French/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 10/11/2012 12:34:21 PM  
**Subject:** Published Fuel Economy Guide  
[winmail.dat](#)

Hello Dave;

Volkswagen has decided to not include the 2013 Jetta Hybrid, label index # 100, in the published fuel economy guide. Details regarding the current configuration will be provided in the near future. Please see that fuel economy label index # 100, for the Jetta Hybrid, is withdrawn from the information that was sent to Washington at the end of August.

Best regards,  
Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
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Phone: 248 754-4213

Fax: 248 754-4207

[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 10/17/2012 1:23:27 PM  
**Subject:** Published Guide Information  
[winmail.dat](#)

Hi Dave;

Would you be so kind, to confirm that the 2013 fuel economy label, index 100, for the Volkswagen Jetta Hybrid is not included in the published fuel economy guide to be printed sometime in November.

As you also confirmed with our phone conversation, I understand that due to the November release date in Verify, this label index 100 will also not appear on the web fuel economy site either.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Mon 10/29/2012 10:13:53 AM  
**Subject:** 2013 Audi Images for Online Guide  
[winmail.dat](#)  
[2013 Audi Q5.jpg](#)  
[2013 Audi S6.jpg](#)  
[2013 Audi S7.jpg](#)  
[2013 Audi S8.jpg](#)

Hello Dave;

After review of the fueleconomy.gov site we noticed a number of Audi models which did not have vehicle images posted. Please find images for the following Audi models:

Audi Q5 Hybrid  
Audi S6  
Audi S7  
Audi S8

Please pass these along to Janet to assist her in completing the Audi information on the web site. If there are any difficulties with these files please let me know.

Best regards,  
Richard

Richard E. Thomas  
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Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
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Richard.Thomas@VW.com



**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Fri 11/30/2012 3:42:18 PM  
**Subject:** 2011 VOLKSWAGEN Group Final LDT CAFE  
[winmail.dat](#)  
[CBI\\_BVWX\\_COMMON\\_CAFE\\_LDT\\_R00.PDF](#)

Hi Dave;

Here is the first 2011 LDT Volkswagen Group CAFE report and it may also be found in Verify. I am still waiting on some financial information regarding CAFE ratio from other departments to complete the 2011 Passenger Car CAFE report and cover letter. I should have it early next week. If you have any questions please contact me directly.

Best regards,  
Richard

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CBI\_BVWX\_COMMON\_CAFE\_LDT\_R00.PDF

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**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Tue 12/4/2012 11:28:38 AM  
**Subject:** 2011 VOLKSWAGEN Group Final Passenger Car CAFE Report  
[winmail.dat](#)  
[CBI\\_BVWX\\_COMMON\\_CAFE\\_LDV\\_R00.PDF](#)

Hello Dave;

Please find attached the 2011 Volkswagen Group Passenger Car Final CAFE. This file has also been uploaded to Verify. If you have any questions please contact me directly.

Best regards,  
Richard

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CBI\_BVWX\_COMMON\_CAFE\_LDV\_R00.PDF

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[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** oliver.schmidt@vw.com;richard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; ichard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** john.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; enrietta.Dandy@dot.gov[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 1/2/2013 6:09:30 PM  
**Subject:** EPA CAFE letter & calculation attached - 2011 VW Group IP, LT

This e-mail message forwards a signed EPA letter and Corporate Average Fuel Economy (CAFE) calculation to your office.

This e-mail and the Adobe Acrobat (.pdf) attachment are an official Agency action. If there is a problem with the attachment or if you are not the intended recipient, please contact your certification team representative immediately. Adobe Acrobat Reader version 5.0 or later is required to open the attached PDF document(s).

[attachment "2011\_VWX\_LT\_20121206\_101129\_CAFE.pdf" deleted by David Good/AA/USEPA/US]  
[attachment "2011\_VWX\_IP\_20121206\_102046\_CAFE.pdf" deleted by David Good/AA/USEPA/US]

**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Mon 1/7/2013 1:30:50 PM  
**Subject:** RE: Telephone Message

Hello Dave:

I heard part of your telephone message regarding diesel fuel, but the system cut it short due to length. My understanding is that you believe that the diesel fuel spec in the ARB LEV III regulations does not comply with the EPA diesel fuel spec. I assume you mean test fuel. You asked if we agree that this is the case, and then the message was cut off. I guess that the rest of the question might be what the implications are for Tier 3 or if we would have some suggestions on how to address this situation. I will discuss this internally and we will respond to the initial question. Please let me know what additional information you may want. A short e-mail would be good, since our telephone message system appears to have some limitations.

Best regards and Happy New Year!

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com];  
Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 1/10/2013 1:54:52 PM  
**Subject:** 2013 Beetle Convertible automatic Fuel Economy  
[winmail.dat](#)

Hello Jim;

I spoke with Dave Good earlier this week, regarding the fuel economy labeling for the Beetle Convertible TDI automatic, he asked me to additionally contact you. As you know the replacement fuel economy data vehicle for the Beetle Convertible TDI automatic, will be confirmed at your facility in March 2013. Unfortunately, it comes late with regard to the port release of this model as several orders have been sold but not delivered. This Beetle Convertible TDI automatic model is on hold, pending the fuel economy label.

We wish to label this model with the new data vehicle and Wolfsburg results. If required, after confirmatory testing has been completed and a relabel is required because of lower EPA test results, we will complete a relabel in March. We will offer a voluntary lower highway result for this vehicle model type, I do not think a relabel will be necessary.

Dave did not seem to have any concerns, but you were involved with the discussions on this model, so I request that if you see any difficulties with this plan, please let me know. Is there any way we can use a voluntary lower specific fuel economy label prior to the Verify system coming back on line on January 14th?

Best regards,  
Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com<mailto:Richard.Thomas@VW.com>

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Sat 1/12/2013 12:20:37 PM  
**Subject:** RE: 2013 Beetle Convertible automatic Fuel Economy  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)  
<mailto:Richard.Thomas@VW.com>  
[image001.gif](#)

Hi Dave;

It was successfully entered and accepted into Verify on Friday, Jan 11th, Volkswagen index 135. If you need more let me know.

Thanks

Richard

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Friday, January 11, 2013 3:19 PM  
To: Thomas, Richard (EEO)  
Cc: Snyder.Jim@epamail.epa.gov; Kata, Leonard (EEO)  
Subject: Re: 2013 Beetle Convertible automatic Fuel Economy

Richard,

If you need to label a vehicle prior to Monday morning (when Verify comes back up) you can send us the label notification, a vehicle description, the fuel economy mpg values, etc in short letter to EPA.

Dave

"Thomas, Richard (EEO)" ---01/10/2013 08:55:52 AM---Hello Jim; I spoke with Dave Good earlier this week, regarding the fuel economy labeling for the Bee

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: David Good/AA/USEPA/US@EPA, "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
Date: 01/10/2013 08:55 AM  
Subject: 2013 Beetle Convertible automatic Fuel Economy



Hello Jim;

I spoke with Dave Good earlier this week, regarding the fuel economy labeling for the Beetle Convertible TDI automatic, he asked me to additionally contact you. As you know the replacement fuel economy data vehicle for the Beetle Convertible TDI automatic, will be confirmed at your facility in March 2013. Unfortunately, it comes late with regard to the port release of this model as several orders have been sold but not delivered. This Beetle Convertible TDI automatic model is on hold, pending the fuel economy label.

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Best regards,  
Richard

Richard E. Thomas  
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Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com<mailto:Richard.Thomas@VW.com>

(See attached file: winmail.dat)

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Tue 1/22/2013 7:12:52 PM  
**Subject:** RE: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

Hi Dave;

I have made one typo FE correction and a couple of calculation errors resulting in unadjusted, unrounded combined CO2 errors affected four of the five error messages. These did not affect any label values for these models, I believe all is good now.

We would like to discuss the Verify manufacturer codes (i.e.: VWX, ADX, BEX) proposed and approved for 2015 by our parent company and regarding the use of a common Volkswagen Group (VGA) code for all brands within the group. Somewhat similar to what the General uses. If you have a moment to discuss, please give me a call so we can set up either a visit or phone discussion and its attendees. I think we would have to get Bob Peavyhouse involved at a minimum.

Thanks,

Richard

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Tuesday, January 22, 2013 12:22 PM  
To: Thomas, Richard (EEO)  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: re: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

Richard,

Our macro picked up a few errors in your 2014 labels. Attached are the data in Verify as of January 17, 2013 for 2014 model year FE labels. Labels with pea green fill in the first few columns contained errors and were not sent to DOE for posting on the web (provided the label release date was Jan 22, 2013 or earlier).

I'll run my next query of the 2014 FE Label data on Feb 1, 2013---for posting on the web a few days later.

Please make any needed corrections when you get a chance.

Thanks

(See attached file: VW\_Group\_2014 FEGuide-all rel dates-no-sales-1-17-2013.xlsx)

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** CN=David Good/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/22/2013 8:14:27 PM  
**Subject:** RE: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

Bob Hart brought this up to me back before he retired. This is with regard to Test Groups right? He talked about it for test groups and certificates but I guess its more relevant for GHG calculations right? I can set up a meeting but I'm wondering who all to invite depending on the scope of this.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Thomas, Richard (EEO)" <[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)>  
To: David Good/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 01/22/2013 02:12 PM  
Subject: RE: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

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Richard

From: [Good.David@epamail.epa.gov](mailto:Good.David@epamail.epa.gov) [mailto:[Good.David@epamail.epa.gov](mailto:Good.David@epamail.epa.gov)]  
Sent: Tuesday, January 22, 2013 12:22 PM  
To: Thomas, Richard (EEO)  
Cc: [Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
Subject: re: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

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(See attached file: VW\_Group\_2014 FEGuide-all rel dates-no-sales-1-17-2013.xlsx)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 1/23/2013 1:44:13 PM  
**Subject:** RE: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)  
[VGA sample VECI labels.pdf](#)  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[Good.David@epamail.epa.gov](mailto:Good.David@epamail.epa.gov)  
[www.fueleconomy.gov](http://www.fueleconomy.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)  
[www.fueleconomy.gov](http://www.fueleconomy.gov)  
[Good.David@epamail.epa.gov](mailto:Good.David@epamail.epa.gov)  
<mailto:Good.David@epamail.epa.gov>  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[www.fueleconomy.gov](http://www.fueleconomy.gov)

Hi Jim;

Yes, this is the same subject that Bob Peavyhouse and I talked about when I was preparing the 2011 final CAFE report in Verify, and before Bob Hart got involved. It was a nightmare with regard to granting permissions for one manufacture to use data from another. We currently have five different EPA Verify accounts (one for each brand sold in the U.S.). The proposal is to use one code in Verify for VOLKSWAGEN Group of America, Inc. (VGA) for all brands, Volkswagen, Bentley, Audi, Lamborghini and Bugatti.

This VGA code would be used in all brand test groups for example 2015: "FVGAVxxxxxx". I have attached a sample of each of the brand emission control information labels. This method was agreed by all the brands and was approved by the top management of our parent company in Germany. Porsche will be integrated into and under this new VGA code beginning with model year 2017 at the earliest.

There may have to be some special programing in order for us to use older data for the new code, but in the end it should be easier for everyone to process the huge amount of future data. For that reason I am sure Bob Peavyhouse would need to be included.

Thanks,

Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, January 22, 2013 3:14 PM  
To: Thomas, Richard (EEO)  
Cc: Good.David@epamail.epa.gov  
Subject: RE: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on  
www.fueleconomy.gov

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Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 01/22/2013 02:12 PM  
Subject: RE: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on  
www.fueleconomy.gov

Hi Dave;

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Thanks,  
Richard

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Tuesday, January 22, 2013 12:22 PM  
To: Thomas, Richard (EEO)  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: re: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

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I'll run my next query of the 2014 FE Label data on Feb 1, 2013---for posting on the web a few days later.

Please make any needed corrections when you get a chance.

Thanks

(See attached file: VW\_Group\_2014 FEGuide-all rel dates-no-sales-1-17-2013.xlsx)



**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 1/30/2013 11:29:39 AM  
**Subject:** RE: 2013 FE Guide - Errors in Verify as of 1/27/2013 which need correcting before 2/1/2013 if possible

Hello Dave;

I have corrected the 2013 label #135, it should be okay now.

Thanks,

Richard

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Tuesday, January 29, 2013 5:14 PM  
To: Thomas, Richard (EEO)  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: re: 2013 FE Guide - Errors in Verify as of 1/27/2013 which need correcting before 2/1/2013 if possible

Richard,

re: 2013 FE Guide - Errors in Verify as of 1/27/2013 which need correcting before 2/1/2013 if possible

Our macro picked up some errors in your 2013 Labels. If possible please correct them before 2/1/2013--- so I can send the data to DOE for posting on the web (for the Feb 1st posting).

Sorry about the late notice. I'll also include the 2014 Labels FYI--they looked OK to me.

Thanks

(See attached file: VW\_Group\_2013 FEGuide new labels-all rel dates-no-sales-1-25-2013.xlsx)(See attached file: VW\_Group\_2014 FEGuide-all rel dates-no-sales-1-25-2013.xlsx)

**To:** Jim Snyder/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Wed 2/6/2013 4:53:59 AM  
**Subject:** VW/EPA Certification Meeting October 29, 2012  
[00 Agenda EPA Cert-Test.pptx](#)  
[01 Start Stop Survey.pptx](#)  
[02 FFV.pptx](#)  
[03 AWC.pptx](#)  
[04 BEV EPA.pptx](#)  
[05 BEVx 2012 EPA.ppt](#)  
[06 SAE 1634 EPA.pptx](#)  
[07 PHEV.pptx](#)  
[08 Energy assist EPA.pptx](#)  
[VW EPA Cert Meeting Oct 29,2012.pdf](#)

Hello Jim, Dave, and Chris:

I know that some time has passed since we met in October 2012, but I would appreciate it if you would take a look at the meeting report and provide any comments or feedback. Other EPA staff participated as well and may wish to contribute their comments.

I have attached all of the slides from our meeting, for ready reference. The report is the last attachment. Please let me know if this should go into VERIFY.

Since the report indicates some follow-up on the part of VW and EPA, we would appreciate an opportunity to have a telephone conference/webinar to discuss the open points.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** CN=David Good/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**Bcc:** []  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 2/6/2013 2:01:29 PM  
**Subject:** 2013 Beetle Convertible Image

[attachment "winmail.dat" deleted by David Good/AA/USEPA/US]

[attachment "121116\_VW\_Beetle\_1062 copy.jpg" deleted by David Good/AA/USEPA/US]

Hi Dave;

Could you please forward this image to Janet at DOE to include it in the 2013 fuel economy guide and the web site. I noticed that there was no image for the Beetle Convertible and the fuel economy dot gov site.

Thanks,  
Richard

**To:** "Boundy, Robert Gary" [boundyrg@ornl.gov]  
**Cc:** David Good/AA/USEPA/US@EPA;"Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Hopson, Janet L."  
**Sent:** Wed 2/6/2013 6:08:20 PM  
**Subject:** FW: 2013 Beetle Convertible Photo for the web  
[winmail.dat](#)  
[121116 VW Beetle 1062 copy.jpg](#)  
[121116 VW Beetle 1062 copy.jpg.001](#)  
[Richard.Thomas@vw.com](#)

Hi Richard:

You are welcome to send these directly to Bob Boundy.

He is responsible for collecting the photos used on fueleconomy.gov.

Thanks!

Janet

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Wednesday, February 06, 2013 12:48 PM  
To: Hopson, Janet L.  
Subject: Fw: 2013 Beetle Convertible Photo for the web

Janet,

Here's a picture for the web.

Dave

----- Forwarded by David Good/AA/USEPA/US on 02/06/2013 12:45 PM -----

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Date: 02/06/2013 10:14 AM  
Subject: 2013 Beetle Convertible Image

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Richard

(See attached file: winmail.dat)(See attached file: 121116\_VW\_Beetle\_1062 copy.jpg)

**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 10/27/2011 3:12:36 PM  
**Subject:** VWGoA EEO 5-Cycle CO2 Calculator  
VWGoA EEO CO2 5-Cycle Label Calculator.xlsx

Hello Dave;

Thanks for the information and the discussion today. Please find attached my quick CO2 5-cycle calculator. If you notice anything that needs attention please let me know.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;"Kata, Leonard" [Leonard.Kata@vw.com]; Kata, Leonard" [Leonard.Kata@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Fri 10/28/2011 12:34:12 PM  
**Subject:** FW: VWGoA EEO 5-Cycle CO2 Calculator  
[VWGoA EEO CO2 5-Cycle Label Calculator.xlsx](#)

Hello Bob;

## Ex. 6

I just wanted to find out if you are nearing completion of an EPA CO2 5-cycle label calculator. Do you have an estimate of when you might have something that you will share with manufacturers?

We have to begin requesting bag CO2 data from our factories for the 2013 new label and I want to be sure our 5-cycle calculations agree with the EPA's calculations.

Best regards,

Richard

From: Thomas, Richard (EEO)  
Sent: Thursday, October 27, 2011 11:13 AM  
To: 'Good.David@epamail.epa.gov'  
Subject: VWGoA EEO 5-Cycle CO2 Calculator

Hello Dave;

Thanks for the information and the discussion today. Please find attached my quick CO2 5-cycle calculator. If you notice anything that needs attention please let me know.



Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Fri 12/16/2011 6:42:42 PM  
**Subject:** FW: VWGoA EEO 5-Cycle CO2 Calculator  
[VWGoA EEO CO2 5-Cycle Label Calculator.xlsx](#)

Hello Bob;

I was wondering if there was a draft version of the EPA 5-cycle calculator that I can look at to see if we will be on the same page when it comes to calculating 2013 label values. I just received some of the CO2 bag test results from Germany and I would like to see if the values I calculate will agree with the EPA calculation.

Best regards,

Richard

From: Thomas, Richard (EEO)  
Sent: Friday, October 28, 2011 8:34 AM  
To: 'Robert Peavyhouse'  
Cc: 'Good.David@epamail.epa.gov'; Kata, Leonard  
Subject: FW: VWGoA EEO 5-Cycle CO2 Calculator

Hello Bob;

I hope you make a speedy recovery. I understand from Dave you are working at home after some knee issues.

I just wanted to find out if you are nearing completion of an EPA CO2 5-cycle label calculator. Do you have an estimate of when you might have something that you will share with manufacturers?

We have to begin requesting bag CO2 data from our factories for the 2013 new label and I want to be sure our 5-cycle calculations agree with the EPA's calculations.

Best regards,

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Best regards,

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Richard.Thomas@VW.com

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;"Kata, Leonard" [Leonard.Kata@vw.com]; Kata, Leonard" [Leonard.Kata@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Tue 12/20/2011 3:11:39 PM  
**Subject:** RE: FW: VWGoA EEO 5-Cycle CO2 Calculator  
<http://www.epa.gov/nvfe/>

Hi Bob;

Thanks for sending me your draft EPA FE/CO2 calculator. I have saved it to our drive and tested it against my calculator and the numbers for city and highway agree exactly to eight places right of the decimal.

I tested fuel economy and CO2 for 5DC (Derived 5-cycle), M5C Std 3-Bag (Modified 5-cycle), and V5C Std 3-Bag (Vehicle Specific 5-Cycle) for a gasoline fueled vehicle.

Will you be adding the Combined calculations to your chart? If you are open to suggestions, I might suggest that an additional entry for the test number be added so that when the calculated values are added to the log it would then be recorded. If the other cells to the right of the logged data are open to make an entry with some manufacturer notes that would be helpful too.

I don't have bag CO2 values for any of our Hybrid models so I am unable to test that section right now.

I did notice that when I deleted data from the log, that a Microsoft Visual Basic run-time error appeared "1004", activate method of Pane class failed. It did however delete the rows I specified.

If you have any questions or comments please feel free to call. I like your calculator and feel I would use it on a regular basis once finalized.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

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Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

From: Robert Peavyhouse [mailto:Peavyhouse.Robert@epamail.epa.gov]  
Sent: Monday, December 19, 2011 10:33 AM  
To: Thomas, Richard (EEO)  
Subject: Re: FW: VWGoA EEO 5-Cycle CO2 Calculator

Richard,

I had worked on one a month ago or so, but I never had a chance to test a bunch of different scenarios.

I don't quite consider it a "finished" product yet, but you can try it out if you would like.

If you run into any errors, try to document exactly what you did to get the error, and I will try to fix it.

I wrote it in Excel 2007, but if you need a copy in Excel 2003, let me know.  
For Excel 2007, you will have to put it in a "trusted" directory to get the macro to run. The security settings in Excel 2007 are significantly tougher than 2003.  
If you don't know how to do that, call me and I will walk you through the process.

Here is:

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: David Good/AA/USEPA/US@EPA

Date: 12/16/2011 01:42 PM  
Subject: FW: VWGoA EEO 5-Cycle CO2 Calculator

Hello Bob;

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Sent: Friday, October 28, 2011 8:34 AM  
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Richard

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Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

[attachment "VWGoA EEO CO2 5-Cycle Label Calculator.xlsx" deleted by Robert Peavyhouse/AA/USEPA/US]

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 12/22/2011 7:03:56 PM  
**Subject:** Derived 5-Cycle Calculation  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

Hi Bob;

Thanks for your message yesterday. I discovered that I have a discrepancy in the fuel economy numbers when I use the 5-cycle derived calculator function and try and calculate a model type value. It prompted me to look to the regulations contained in 40 CFR 600.210-12 (a) (2) Derived 5-cycle labels.

The regulations seem to indicate that the derived 5-cycle calculation formula is used on model type values and there therefore I don't have any need to use it at the configuration level. Is that your understanding? I am assuming that this formula would be applied to a sales weighted model type MPG value four place right of the decimal.

If you need to see a sample calculation, just let me know.

If I don't talk to you again this year, I wish you and yours, a happy holiday and Happy New Year!

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)



**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Tue 1/10/2012 6:11:49 PM  
**Subject:** 2013 EPA 5-Cycle Calculator

Hello Bob;

I was just wondering if you were going to add the calculated combined fuel economy and CO2 values to your calculator in your next revision?

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
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Richard.Thomas@VW.com

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;"Kata, Leonard" [Leonard.Kata@vw.com]; Kata, Leonard" [Leonard.Kata@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 1/11/2012 11:47:39 AM  
**Subject:** RE: 2013 EPA 5-Cycle Calculator  
<http://www.epa.gov/nvfel/>  
<http://www.epa.gov/nvfel/>

Okay Bob, no problem. Thanks for incorporating it into the calculator.

I realize that you are a busy guy, sorry to keep pestering you. On another related subject, were you able to make any progress to the Volkswagen Group 2011 CAFE file like the file you sent me last year for the final 2010 CAFE? See attached e-mail.

I have a colleague working on gathering all the final sales numbers to prepare the 2011 VWGoA final CAFE report and I want to begin working on that as soon as possible and before I have to begin calculating 2013 fuel economy labels. Our IT people are working vigorously to create a system to support the new 2013 fuel economy labels.

Best regards,

Richard

From: Robert Peavyhouse [mailto:Peavyhouse.Robert@epamail.epa.gov]  
Sent: Tuesday, January 10, 2012 3:59 PM  
To: Thomas, Richard (EEO)  
Subject: Re: 2013 EPA 5-Cycle Calculator

Richard,

I am more than willing to, I just haven't had a chance to work on that project for a while.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: David Good/AA/USEPA/US@EPA  
Date: 01/10/2012 01:12 PM  
Subject: 2013 EPA 5-Cycle Calculator

Hello Bob;

I was just wondering if you were going to add the calculated combined fuel economy and CO2 values to your calculator in your next revision?

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
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Phone: 248 754-4213  
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Richard.Thomas@VW.com

Received: from vwoaahsxb101.vwoa.na.vwg ([10.136.103.218]) by VWOAAHSXH001.vwoa.na.vwg with Microsoft SMTPSVC(6.0.3790.4675); Mon, 3 Oct 2011 10:50:21 -0400  
Received: from mailgate1.vw.com ([10.136.103.246]) by vwoaahsxb101.vwoa.na.vwg with Microsoft SMTPSVC(6.0.3790.4675); Mon, 3 Oct 2011 10:50:20 -0400  
Received: from localhost (localhost [127.0.0.1]) by amgwyin01.vwoa.na.vwg (MOS 4.1.9-GA) id HPA57049; Mon, 3 Oct 2011 10:50:20 -0400 (EDT)  
Received: from mblast02.rtp.epa.gov (mblast02.rtp.epa.gov [134.67.221.152]) by amgwyin01.vwoa.na.vwg (MOS 4.1.9-GA) with ESMTP id HPA57038; Mon, 3 Oct 2011 10:50:17 -0400  
Received: from mblast02.rtp.epa.gov (localhost.localdomain [127.0.0.1]) by localhost (Postfix) with SMTP id 808054440B for <Richard.Thomas@vw.com>; Mon, 3 Oct 2011 10:41:24 -0400 (EDT)  
Received: from mintra02.rtp.epa.gov (mintra02.rtp.epa.gov [134.67.221.154]) by mblast02.rtp.epa.gov (Postfix) with ESMTP id 790C7442FB for <Richard.Thomas@vw.com>; Mon, 3 Oct 2011 10:41:24 -0400 (EDT)  
Received: from mintra02.rtp.epa.gov (localhost.localdomain [127.0.0.1]) by localhost (Postfix) with SMTP id 6202E443BB for <Richard.Thomas@vw.com>; Mon, 3 Oct 2011 10:41:24 -0400 (EDT)  
Received: from epahub11.rtp.epa.gov (v18h1drtgu011.aa.ad.epa.gov [134.67.222.133]) by mintra02.rtp.epa.gov (Postfix) with ESMTP id 57032443DC for <Richard.Thomas@vw.com>; Mon, 3 Oct 2011 10:41:24 -0400 (EDT)  
From: "Peavyhouse.Robert@epamail.epa.gov" <Peavyhouse.Robert@epamail.epa.gov>  
To: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
Subject: Re: CAFE and the custom data  
Date: Mon, 3 Oct 2011 14:41:23 +0000  
Message-ID: <OFDB521B68.F7BB4436-ON8525791E.00509819-8525791E.0050B1DD@epamail.epa.gov>  
In-Reply-To: <42B68924F222AB40986DF38DDCBE99980112A521@VWOAAHSXH001.vwoa.na.vwg>  
Content-Type: multipart/alternative;

boundary="\_000\_OFDB521B68F7BB4436ON8525791E005098198525791E0050B1DDepa\_"  
Content-Language: en-US  
Thread-Topic: CAFE and the custom data  
Thread-Index: AcyB28dTZlkemm63SOKrEWsekSm/kQ==  
References: <42B68924F222AB40986DF38DDCBE99980112A521@VWOOAHSHX001.vwoa.na.vwg>  
X-MS-Has-Attach:  
X-MS-TNEF-Correlator:  
MIME-Version: 1.0

Richard,

I will start working on converting it to the new format.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: David Good/AA/USEPA/US@EPA  
Date: 10/03/2011 10:30 AM  
Subject: CAFE and the custom data

Hello Bob;

Earlier this year you provided me with a data file that you configured to put all the general label index files together for the 2010 final CAFE. I could open it in Verify and change the volumes to add the final numbers and also eliminate tests numbers not needed for the CAFE (i.e.: Cold Co, SC03, US06). This was a great time saver as you know and I wondered if this is something that you will perform for us again next year when we prepare the 2011 model year Final CAFE Reports?

Please let me know your thoughts, as we have finished testing release 9 in house, without any major difficulties. This one point came up in loading only a few indexes into the CAFE section.

If not, then I must have our guys here put together a program to perform this task on the label indexes.

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)

Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Linc Wehrly/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David Good/AA/USEPA/US@EPA; Arvon Mitcham/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David Good/AA/USEPA/US@EPA; Arvon Mitcham/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA; David Good/AA/USEPA/US@EPA; Arvon Mitcham/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA; Arvon Mitcham/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Thur 1/8/2009 7:11:31 PM  
**Subject:** RE: Fw: Hybrid Vehicle Meeting in Early 2009

Hello Jim:

I have heard back from my colleagues regarding the timing of a meeting to discuss topics related to the certification and testing of hybrid vehicles. The proposal is the end of the week of March 2, 2009. More specifically, the afternoon of March 5 and the morning of March 6. I am not sure how you would feel about dividing the meeting over two days, particularly since the second day is a Friday. I realize that some of the staff may not be in on Friday.

Please let me know if this timeframe is workable.

Best regards,

Len Kata

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, December 11, 2008 4:30 PM  
To: Kata, Leonard  
Subject: Re: Fw: Hybrid Vehicle Meeting in Early 2009

Len, We are certainly interested in having a meeting with them. It will be with me, Linc, Steve Healy, Chris Nevers, Dave Good and possibly Arvon Micham. I don't think we have any particular timing constraints yet.

Are they planning to visit the U.S. a particular week? Let me know and I will fit a meeting time into our schedules.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

Linc Wehrly/AA/USEPA/US

12/09/2008 08:07 AM

To Jim Snyder/AA/USEPA/US@EPA  
cc Stephen Healy/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA  
Subject Fw: Hybrid Vehicle Meeting in Early 2009

Jim,

Please be sure to invite Steve and Chris to this meeting.

Thanks,  
Linc

Linc Wehrly  
Manager, Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4286  
wehrly.linc@epa.gov

----- Forwarded by Linc Wehrly/AA/USEPA/US on 12/09/2008 08:06 AM -----

"Kata, Leonard" <Leonard.Kata@vw.com>  
Sent by: "Kata, Leonard" <Leonard.Kata@vw.com>

Received Date:  
12/08/2008 04:55 PM  
Transmission Date:  
12/08/2008 04:55:42 PM

To Linc Wehrly/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Jim  
Snyder/AA/USEPA/US@EPA, [Ex. 7]@arb.ca.gov>, [Ex. 7]@arb.ca.gov>  
cc  
Subject Hybrid Vehicle Meeting in Early 2009

To all:

My colleagues in at our parent company in Germany have expressed an interest in meeting with the certification staff at EPA and ARB to discuss issues related to hybrid vehicle technology and certification. The following is a general list of the topics of interest:

- HEV Concepts/Technology
- Certification, Durability, Emissions Measurement
- Test Procedures
- Pressurized Fuel Tank
- Bench Testing
- Other

We would like to use the opportunity to share our thoughts on these topics and discuss the intent and direction of the agencies. At this time I would like to suggest meeting with each agency separately, in the mid-February to early-March time frame. My questions are 1.) whether the agencies are agreeable to such a meeting, 2.) who you would recommend participate from the agencies, and 3.) if there any particular time constraints during the suggested period.

I appreciate your consideration of this suggestion and look forward to hearing from you.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

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E-Mail: leonard.kata@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Thur 1/8/2009 7:40:49 PM  
**Subject:** RE: Fw: Hybrid Vehicle Meeting in Early 2009

Hi Jim:

I will have to get back to you on the number of people. Not everyone is back to work yet in Germany so it will likely be the beginning of next week. If you have to act quickly to reserve a room, I would guess at about 5 people in our group and 1 pm to 4 pm on Thursday and 9 am to noon on Friday.

Thanks and best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

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From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, January 08, 2009 2:24 PM  
To: Kata, Leonard  
Subject: RE: Fw: Hybrid Vehicle Meeting in Early 2009

Forgot to ask, do you know what time you will show up on Thursday and Friday? So I can book a room. And roughly how many people?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

"Kata, Leonard" <Leonard.Kata@vw.com>

01/08/2009 02:11 PM  
To Jim Snyder/AA/USEPA/US@EPA

cc Linc Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA,  
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Linc Wehrly/AA/USEPA/US

12/09/2008 08:07 AM

To Jim Snyder/AA/USEPA/US@EPA  
cc Stephen Healy/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA  
Subject Fw: Hybrid Vehicle Meeting in Early 2009

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Thanks,  
Linc

Linc Wehrly  
Manager, Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4286  
wehrly.linc@epa.gov

----- Forwarded by Linc Wehrly/AA/USEPA/US on 12/09/2008 08:06 AM -----

"Kata, Leonard" <Leonard.Kata@vw.com>

Sent by: "Kata, Leonard" <Leonard.Kata@vw.com>

Received Date:

12/08/2008 04:55 PM

Transmission Date:

12/08/2008 04:55:42 PM

To Linc Wehrly/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Jim  
Snyder/AA/USEPA/US@EPA, **Ex. 7** @arb.ca.gov>, **Ex. 7** @arb.ca.gov>  
cc

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- Bench Testing
- Other

We would like to use the opportunity to share our thoughts on these topics and discuss the intent and direction of the agencies. At this time I would like to suggest meeting with each agency separately, in the mid-February to early-March time frame. My questions are 1.) whether the agencies are agreeable to such a meeting, 2.) who you would recommend participate from the agencies, and 3.) if there any particular time constraints during the suggested period.

I appreciate your consideration of this suggestion and look forward to hearing from you.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Reineke, Dennis"  
**Sent:** Fri 1/30/2009 3:49:44 PM  
**Subject:** Audi Durability Grouping Request

Hello Jim,

In response to the questions raised in our recent phone call about durability and test group grouping the paragraph below provides Audi AG's intent.

Audi intends to use a catalyst with a 66% higher loading rate as part of their strategy to meet CARB 2010 MY catalyst efficiency monitoring requirements. This change will occur as part of the carryover of the 50-State certified Audi S6 and S8 models. All vehicles in the durability group/test group will be built with the new catalyst. Engine calibration, catalyst size, catalyst location and catalyst precious metal composition are all unchanged. The only difference compared to previous model years is the increased precious metal loading rate. Initial development testing shows a reduction of approximately 15% in emissions and no effect on fuel economy. Based on supplier testing and Audi AG's experience with similar catalyst the deterioration rate for this new catalyst is expect to be equal to or better than the existing catalyst. Audi intends include this catalyst in carryover durability group AADXGPNN385 / Test Group AADXV05.2385. Durability factors from the 2007-09 MY carryover durability vehicle would be used to support 2010 MY certification. A new durability vehicle would not be required.

We believe this approach is allowed under 86.1820-01(e)

Please review and contact me with any questions.

Best Regards,

Dennis E. Reineke  
Certification Specialist  
Engineering and Environmental Office

Volkswagen Group of America

3800 Hamlin Road  
Mail Code EEO  
Auburn Hills, MI 48326  
USA  
Phone: +1-248-754-4215  
Fax : +1-248-754-4207  
Mail To: Dennis.Reineke@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Mon 2/16/2009 11:07:38 PM  
**Subject:** FW: MY2010 Durability Approvals

Hi Jim:

Second attempt. I received an "undeliverable" response to the 'synder.jim@epa.gov' address.

Regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

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FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

-----Original Message-----

From: Kata, Leonard  
Sent: Monday, February 16, 2009 6:04 PM  
To: 'Mitcham.Arvon@epamail.epa.gov'  
Cc: "  
Subject: RE: MY2010 Durability Approvals

Hello Arvon:

I left a telephone message, but I thought that I would follow-up with an e-mail.

I am interested in the status of the VW request for carryover of the durability program to 2010. Any news?

Best regards,

Len

---

Leonard W. Kata  
Manager  
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Engineering and Environmental Office

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E-Mail: leonard.kata@vw.com

-----Original Message-----

From: Kata, Leonard  
Sent: Friday, January 30, 2009 7:06 PM  
To: 'Mazaitis.Vincent@epamail.epa.gov'  
Cc: 'Mitcham.Arvon@epamail.epa.gov'; Reineke, Dennis; Hart, Robert (VWoA)  
Subject: RE: MY2010 Durability Approvals

Hello Mr. Mazaitis:

For the 2010 model year, Volkswagen is requesting carryover of the previously-approved durability procedure. You will find that I have submitted the official request through the VERIFY system for review. It was submitted as Volkswagen input; however, as described in the letter, it applies to all Volkswagen Group brands sold in North America (Volkswagen, Audi, Bentley, Lamborghini and Bugatti).

Please let me know if there are any questions,

Best regards,

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

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-----Original Message-----

From: Reineke, Dennis  
Sent: Thursday, January 29, 2009 2:07 PM  
To: 'Mazaitis.Vincent@epamail.epa.gov'  
Cc: Kata, Leonard  
Subject: RE: MY2010 Durability Approvals

Hello Vince,





D  
Sent by: Arvon  
Mitcham  
MY2010 Durability Approvals  
Received Date:  
01/22/2009 11:24  
AM  
Transmission  
Date:  
01/22/2009  
11:24:16 AM

cc  
Subject

I am waiting for durability approval requests from the following manufacturers:

VW-Audi

If you are the compliance rep. for one of these manufacturers, please remind them that they need to request approval of durability for MY2010 prior to certification. If not, they are in non-compliance with 40 CFR 86.1823-08 (Durability Regulations).

All other manufacturers not listed here have either been approved or are small volume and using assigned DFs.

If you have questions or concerns, let me know. Thank you.

-ALM

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Chris Nevers/AA/USEPA/US@EPA; David Good/AA/USEPA/US@EPA; "Kata, Leonard" [Leonard.Kata@vw.com]; David Good/AA/USEPA/US@EPA; "Kata, Leonard" [Leonard.Kata@vw.com]; Kata, Leonard" [Leonard.Kata@vw.com]; inc Wehrly/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA[]; teph Healy/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Wed 2/18/2009 4:36:52 PM  
**Subject:** Meeting With Volkswagen Group Representatives  
[Agenda EPA Cert draft.ppt](#)

Hello Jim:

I have recently received a draft agenda for the meeting that we have scheduled on March 5-6, 2009. A copy is attached.

Again, we welcome the participation of any additional EPA Staff that you believe would be appropriate. If further clarification is required, or if this draft agenda prompts additional topics that EPA would like us to address, please let me know.

I will be out of the office until the middle of next week and have no access to e-mail. Please feel free to leave a message at my desk telephone or cell phone, if necessary.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

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E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA;Bruce Sdunek/AA/USEPA/US@EPA[]; ruce Sdunek/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 2/26/2009 7:33:54 PM  
**Subject:** VW Group: Audi Field Fixes for MY 2000 thru 2002  
[CBI YAD XV01.8332 APP F01 R00 .PDF](#)  
[CBI 1AD XV01.8342 APP F02 R00 .PDF](#)  
[CBI 2AD XV01.8342 APP F18 R00 .PDF](#)  
<mailto:robert.hart@vw.com>

Hello Jim and Bruce,

I'm not sure which one to send this to, so I'm sending it to both of you.

The attachments contain field fixes for model year 2000 through 2002 Audi test groups YAD XV01.8332, 1AD XV01.8342 and 2AD XV01.8342. The Verify system only goes back to model year 2003. This is the reason for this e-mail.

There are nine additional Audi field fixes uploaded to the Verify system.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Mon 3/2/2009 8:37:51 PM  
**Subject:** Accepted: VW : Hybrid Vehicle Meeting Part 1 of possibly 2

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Mon 3/2/2009 8:37:59 PM  
**Subject:** Accepted: VW : Hybrid Vehicle Meeting Part 2 of possibly 2

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kohnen, Christoph (VWGoA)"  
**Sent:** Wed 3/4/2009 1:56:09 PM  
**Subject:** Accepted: VW : Hybrid Vehicle Meeting Part 1 of possibly 2

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kohnen, Christoph (VWGoA)"  
**Sent:** Wed 3/4/2009 1:56:19 PM  
**Subject:** Accepted: VW : Hybrid Vehicle Meeting Part 2 of possibly 2

**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA[]; ed Trimble/AA/USEPA/US@EPA[]  
**Cc:** "Krause, Norbert (VWoA)" [Norbert.Krause@vw.com]; christoph.kohnen@vw.com>;"Geisen, Anna (I/EA-523)" [anna.geisen@AUDI.DE]; Geisen, Anna (I/EA-523)" [anna.geisen@AUDI.DE]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Johnson, Stuart" [Stuart.Johnson@vw.com]  
**From:** "Kata, Leonard"  
**Sent:** Wed 3/4/2009 7:39:34 PM  
**Subject:** Volkswagen/Audi  
Agenda EPA Cert\_Final.ppt

To all:

A few days ago I distributed a draft agenda for our meetings scheduled for Thursday (5.MAR) and Friday (6.MAR) of this week. We have finalized the agenda and I am now providing the final version. The agenda includes a discussion of durability procedures and OBD, so I have added Arvon Mitcham and Ted Trimble to the distribution. They were not on the EPA meeting invitation, but I hope that they are able to participate.

We will be forwarding some material shortly, that presents a preview of the upcoming Volkswagen and Audi hybrid technology, for your reference.

We will try our best to cover the bulk of this material on Thursday afternoon.

Best regards,

Len

-----  
Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

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3800 Hamlin Road  
Auburn Hills, MI 48326  
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**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** "Geisen, Anna (I/EA-523)" [anna.geisen@AUDI.DE]; N=Arvon Mitcham/OU=AA/O=USEPA/C=US@EPA;CN=Carl Paulina/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Carl Paulina/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; hristoph.kohnen@vw.com;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;"Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Krause, Norbert (VWoA)" [Norbert.Krause@vw.com]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;"Johnson, Stuart" [Stuart.Johnson@vw.com]; Johnson, Stuart" [Stuart.Johnson@vw.com]; N=Ted Trimble/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Chris Nevers/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/5/2009 1:05:48 PM  
**Subject:** Re: Volkswagen/Audi Presentation - 1 of 2

Please note that the attachment was not delivered. Zip files cannot make it through our network security named as .zip. In the future, please rename the file extension.

Regards,  
Chris Nevers  
734 214 4412

"Kata, Leonard" <Leonard.Kata@vw.com>  
Sent by: "Kata, Leonard" <Leonard.Kata@vw.com>  
Received Date:  
03/04/2009 10:34 PM  
Transmission Date:  
03/04/2009 10:34:08 PM  
To Jim Snyder/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA, Ted Trimble/AA/USEPA/US@EPA, Carl Paulina/AA/USEPA/US@EPA  
cc "Krause, Norbert (VWoA)" <Norbert.Krause@vw.com>, <christoph.kohnen@vw.com>, "Geisen, Anna (I/EA-523)" <anna.geisen@AUDI.DE>, "Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>, "Rech, Lothar (I/EA-523)" <Lothar.Rech@AUDI.DE>, "Johnson, Stuart" <Stuart.Johnson@vw.com>  
Subject Volkswagen/Audi Presentation - 1 of 2

1 of 2

To all:

Attached are copies of the graphics that we intend to present during our meetings. There may be some slight variation in the order of presentation for the major topics.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

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Auburn Hills, MI 48326  
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E-Mail: leonard.kata@vw.com

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*

This Email message contained an attachment named  
EPA presentation\_sent\_final.zip  
which may be a computer program. This attached computer program could  
contain a computer virus which could cause harm to EPA's computers,  
network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced  
into the EPA network. EPA is deleting all computer program attachments  
sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you  
should contact the sender and request that they rename the file name  
extension and resend the Email with the renamed attachment. After  
receiving the revised Email, containing the renamed attachment, you can  
rename the file extension to its correct name.

For further information, please contact the EPA Call Center at  
(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** "Geisen, Anna (I/EA-523)" [anna.geisen@AUDI.DE]; N=Arvon Mitcham/OU=AA/O=USEPA/C=US@EPA;CN=Carl Paulina/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Carl Paulina/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; hristoph.kohnen@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;"Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Krause, Norbert (VWoA)" [Norbert.Krause@vw.com]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;"Johnson, Stuart" [Stuart.Johnson@vw.com]; Johnson, Stuart" [Stuart.Johnson@vw.com]; N=Ted Trimble/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 3/6/2009 5:02:21 PM  
**Subject:** Re: VW/Audi Presentation March 5/6, 2009 - EPA Homework Item on Cold NMHC FELs  
[MSAT Vehicle Provisions Summary FINAL RULE.508.pdf](#)

Len & all,

The provisions of 40 CFR 86.1864-10(m) require FELs to be rounded to one decimal place.

Attached is my summary of the MSAT regulations---if the summary does not agree with the regulations, of course, the regulations take precedence.

Regards

"Kata, Leonard" <Leonard.Kata@vw.com>  
03/05/2009 09:13 AM  
To Jim Snyder/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA, Ted Trimble/AA/USEPA/US@EPA, Carl Paulina/AA/USEPA/US@EPA  
cc "Krause, Norbert (VWoA)" <Norbert.Krause@vw.com>, <christoph.kohnen@vw.com>, "Geisen, Anna (I/EA-523)" <anna.geisen@AUDI.DE>, "Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>, "Rech, Lothar (I/EA-523)" <Lothar.Rech@AUDI.DE>, "Johnson, Stuart" <Stuart.Johnson@vw.com>  
Subject VW/Audi Presentation March 5/6, 2009 ... 3 of 5

PART 3 OF 5

Leonard W. Kata  
Manager  
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**FINAL RULE:  
CONTROL OF HAZARDOUS AIR POLLUTANTS  
FROM MOBILE SOURCES**

February, 2007, revised 12/20/07, 5/13/08

**Summary of Vehicle-Related Provisions**

# DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

## 1. Cold Temperature Exhaust Emissions

### Standard and Phase-in

Weight Category (GVWR)	Cert./In-Use Fleet Avg NMHC (g/mi)	Phase-In: Percentage of Vehicles by Model Year							
		2008	2009	2010	2011	2012	2013	2014	2015
LDVs & LLDTs ( $\leq 6,000$ lbs)	0.3	Opt.	Opt.	25	50	75	100	100	100
HLDTs ( $>6,000$ - $8,500$ lbs) & MDPVs ( $>8,500$ - $10,000$ lbs)	0.5	NA	NA	Opt.	Opt.	25	50	75	100

Standard: 86.1811-09(a)(5), 86.1811-10(g)(2), 86.1864-10(a) and (e).

Phase-in: 86.1811-10(g)(2)(iii) and (g)(3), 86.1864-10(f).

### Alternate Phase-In

Weight Category	Alternate Phase-In Equation
LDV/LLDT	$(6 \times \text{API}_{2008}) + (5 \times \text{API}_{2009}) + (4 \times \text{API}_{2010}) + (3 \times \text{API}_{2011}) + (2 \times \text{API}_{2012}) + (1 \times \text{API}_{2013}) \geq 500\%$ , sum of first three products $\geq 100\%$ (i.e., “early year provision”)
HLDT/MDPV	$(6 \times \text{API}_{2010}) + (5 \times \text{API}_{2011}) + (4 \times \text{API}_{2012}) + (3 \times \text{API}_{2013}) + (2 \times \text{API}_{2014}) + (1 \times \text{API}_{2015}) \geq 500\%$ , sum of first three products $\geq 100\%$ (i.e., “early year provision”) -or- $(6 \times \text{API}_{2010}) + (5 \times \text{API}_{2011}) + (4 \times \text{API}_{2012}) + (3 \times \text{API}_{2013}) + (2 \times \text{API}_{2014}) + (1 \times \text{API}_{2015}) \geq 600\%$ , no early year provision

Alternative Phase-In: 86.1811-10(g)(4).

API = anticipated phase-in percentage for the referenced model year.

100% phase-in required by MY 2013 for LDV/LLDTs, MY 2015 for HLDT/MDPVs.

### Interim In-use Standard = Test Group FEL + 0.1 g/mi

Model Year of Introduction	2008	2009	2010	2011	2012	2013	2014	2015
LDV/LLDT:	2008	2009	2010	2011	2012	2013		
Model year for which interim in-use standard applies	2009	2010	2011	2012	2013	2014		
	2010	2011	2012	2013	2014			
	2011	2012	2013					
HLDT/MDPV:			2010	2011	2012	2013	2014	2015
Model year for which interim in-use standard applies			2011	2012	2013	2014	2015	2016
			2012	2013	2014	2015	2016	
			2013	2014	2015			

Interim In-use Standard: 86.1811-10(u), 86.1864-10(i).

Otherwise the in-use standard is the certification standard.

Standards apply for purposes of in-use testing only and do not apply to certification or Selective Enforcement Auditing.

### Calculating Standard

Fleet-Average NMHC exhaust emissions	=	$\frac{(N \times \text{FEL})}{\text{Total \# vehicles sold}}$
---	---	---

Method: 86.1811-10(g)(2)(ii), 86.1864-10(m).

Computed at end of model year using actual sales.

N = The number of LDVs and LLDTs, or HLDTs and MDPVs, sold within the applicable FEL, based on vehicles counted to the point of first sale.

Total # vehicles sold = LDV + LLDTs, or HLDT + MDPVs

# DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

## STANDARD

- Testing [86.1864-10(k)]: Cold carbon monoxide (CO) 20°F FTP test at either durability or test group level; alternative testing procedures may be used provided cold temperature NMHC emissions do not decrease; testing must be on a loaded vehicle weight (LVW) basis.
- Family Emission Limit (FEL) [86.1864-10(m)]: Mfr assigns FEL to all vehicles in durability or test group. One-decimal place FEL is standard for group for full useful life. No cap on FEL.
- Certification, Compliance, and Enforcement: 86.1811-10(g)(2)(iv); 86.1848-10; 86.1864-10(n) and (o).
- Full useful life [86.1805-04(g), 86.1811-10(g), 86.1864-10(b)]:
  - LDV/LLDT: 10 yrs or 120,000 miles, whichever comes first.
  - HLDT/MDPV: 11 yrs or 120,000 miles, whichever comes first.
- Intermediate Useful Life Standard [86.1811-10(g)(2)]: None.

## DURABILITY AND VEHICLE DETERMINATION

- Durability Demonstration [86.1823-01(a)(3)(i)(C), 86.1864-10(j)]: A separate DF may be calculated exclusively using cold temperature NMHC test data to determine compliance with cold temperature NMHC emission standards. For determining compliance with full useful life cold NMHC emission standards, the 68-86 degree F 120,000 mile full useful life NMOG DF may be used.
- Test Group Determination [86.1827-01(a)(5)]: To be in the same test group, vehicles must be subject to the same emission standards (or FEL in the case of cold temperature NMHC standards), except that a mfr may request to group vehicles into the same test group as vehicles subject to more stringent standards, so long as all the vehicles within the test group are certified to the most stringent standards applicable to any vehicle within that test group.
- Emission Data Vehicle Selection [86.1864-10(l)]: For cold temperature NMHC exhaust emission compliance for each durability group, the vehicle expected to emit the highest NMHC emissions at 20 degrees F on candidate in-use vehicles shall be selected from the test vehicles. When the expected worst-case cold temperature NMHC vehicle is also the expected worst-case cold CO vehicle, then cold testing is required only for that vehicle; otherwise, testing is required for both the worst-case cold CO vehicle and the worst-case cold temperature NMHC vehicle [86.1828-10(g)]. EDV in each durability group shall be tested in accordance with the test procedures in subpart C of this part or with alternative procedures requested by the mfr and approved in advance by the Administrator [86.1829-01(b)(3)].

## PHASE-IN COMPLIANCE

- Regular Phase-in Compliance [86.1811-10(g)(5) and (6)]: Mfrs must show compliance with required phase-in schedules by submitting information in Part I applications as required by §86.1844(d)(13). Sales percentages for determining phase-in compliance based upon projected 50-State sales; mfr may petition to allow actual volume produced to be used in lieu of projected sales.
- Alternate Phase-in Compliance [86.1811-10(g)(5)(ii)]: Mfr shows in certification application for the first year in which it intends to use such a schedule, and in each succeeding year during the phase-in, the intended phase-in percentages for that model year and the remaining phase-in years along with the intended final sum of those percentages. In its year end annual reports, mfr must include sufficient information so that the Administrator can verify compliance with the alternative phase-in schedule.

## CREDIT PROGRAM

- Early Credits [86.1864-10(o)(5), 86.1811-10(g)(2)(iv)]: Mfrs may certify LDV/LLDTs for MY 2008-2009 in order to bank credits for use in MY 2010 and later; mfrs may certify HLDT/MDPVs for MY 2010-2011 in order to bank credits for use in MY 2012 and later; early HLDT/MDPV credits may not be applied to LDV/LLDTs before MY 2010; early LDV/LLDT credits may not be applied to HLDT/MDPV before MY 2012.
- Credit Use [86.1864-10(o)(7)]: Credits may be banked and used in a future MY in which a mfr's average exceeds standard, exchanged between the LDV/LLDT and HLDT/MDPV fleets of a given mfr, traded to another mfr; mfr must apply available credits to offset any deficits before trading or carrying over; credits not be permitted to address Selective Enforcement Auditing or in-use testing failures. Vehicles below the standard, and either introduced before phase-in begins or in excess of required phase-in percentage, may both generate credits and offset phase-in requirements.
- Credit Life [86.1864-10(o)(6)]: Credits are not subject to discount or expiration date except as required under the deficit carryforward provisions.

## DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

- Generating Credits [86.1864-10(o) and (o)(4)]: Credits may be generated prior, during, and after the phase-in period. Credits are earned on the last day of the model year using equation, rounded to the nearest tenth: Credits or Debits = (Cold Temperature NMHC Standard – Mfr's Sales-Weighted Fleet Avg Cold NMHC Emissions) × (Total Number of Vehicles Sold); where Total Number of Vehicles Sold = Total 50-State sales based on the point of first sale.
- Compliance [86.1864-10(o)(3)]: The averaging, banking and trading program shall be enforced through the certificate of conformity.
- Debits [86.1864-10(o)(8)]: mfr may carry deficit forward into the next model year only occur after mfr uses banked credits. At the end of that next model year, the deficit must be covered with an appropriate number of credits that the mfr generates or purchases. Any remaining deficit shall be subject to an enforcement action. Mfrs not permitted to run a deficit for two consecutive years

### APPLICABILITY

- Fuel: gasoline-fueled LDV/LLDTs and HLDT/MDPVs; testing with other fuels (e.g., E85, diesel) not required; multi-fuel, bi-fuel or dual-fuel vehicles must comply with requirements using gasoline only [86.1811-10(g)(2)]. For any AECD uniquely used on multi-fuel vehicles when operated on fuels other than gasoline, EPA may request engineering emission data to quantify any emission impact and validity of the AECD [86.1844-01(d)(11), 86.1864-10(k)(3)].
- Altitude: Standards only apply at low altitude [86.1810-09(f)(1)], [86.1864-10(c)]; testing at high altitude not required; mfrs shall submit an engineering evaluation indicating that common calibration approaches are utilized at high altitudes. Any deviation from low altitude emission control practices shall be included in the auxiliary emission control device (AECD) descriptions submitted at certification. Any AECD specific to high altitude shall require engineering emission data for EPA evaluation to quantify any emission impact and validity of the AECD [86.1810-09(f)(2), 86.1844-01(d)(11), 86.1864-10(k)(3)].
- Conversion and ICIs [86.1864-10(a)]: Applies to aftermarket conversion systems as defined in 40 CFR 85.502, including conversion of MDPVs; vehicles imported by ICIs as defined in 40CFR 85.1502.



## DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

### 2. Evaporative Emissions

#### Evaporative Emission Standards (Grams of hydrocarbons per test) [86.1811-09(e)(1)]

Vehicle Category	Model Year	3-Day Diurnal Plus Hot Soak	Supplemental 2-Day Diurnal Plus Hot Soak
LDVs	2009	0.50	0.65
LLDTs	2009	0.65	0.85
HLDTs	2010	0.90	1.15
MDPVs	2010	1.00	1.25

#### STANDARD

- Standards equivalent to California's LEV II standards; would represent about 20-50% reduction (depending on vehicle weight class and type of test) in diurnal plus hot soak standards from the Tier 2 standards that will be in effect in the years immediately preceding the implementation of proposed standards.
- Standards apply both for certification and in-use [86.1811-09(a)(5), (e), (e)(1)].
- Useful life remains unchanged from Tier 2 evaporative requirements; (10 years/120,000 miles for LDVs, LLDTs and 11 years/120,000 miles for HLDTs, MDPVs; optionally 15 years/150,000 miles); ref. 86.1805-04(a) and (b).
- Interim In-use: Tier 2 evaporative emissions standards apply in-use for only the first three model years after an evaporative family is first certified:
  - LDV/LLDTs certified prior to the 2012 model year [86.1811-09(t)(1)].
  - HLDTs and MDPVs certified prior to the 2013 model year [86.1811-09(t)(2)].
- Multi-Fuel Vehicles: Standards apply to the non-gasoline portion of multi-fueled vehicles beginning in 2012 with a 3-year phase in of 30/60/100% based on a combined fleet of LDVs/LLDTs and HLDTs/MDPVs [86.1811-09(e)(1)(ii) and (iii)].

#### TIMING

- LDV/LLDT: 100% compliance in model year 2009; no phase-in period [86.1811-09(e)(1)].
- HLDT/MDPV: 100% compliance in model year 2010; no phase-in period [86.1811-09(e)(1)].

#### DIFFERENCES IN TIER 2 AND LEV II EVAPORATIVE EMISSION TEST REQUIREMENTS

Test Requirement	EPA Tier 2	California LEV II
Fuel volatility (Reid Vapor Pressure in psi):	9	7
Diurnal temperature cycle (degrees F):	72 to 96	65 to 105
Running loss test temperature (degrees F):	95	105

- Test Procedure & Test Fuel:** For low altitude 2-day & 3-day evaporative tests, manufacturers may use either the Federal test procedure (with 9RVP Indolene Tier 2 test fuel) or the California test procedure (7 RVP Phase II test fuel); ref. 86.1811-09(e)(7).
- Durability:** Tier 2 evaporative program requires mfrs to certify the durability of their evaporative emission systems using a fuel containing the maximum allowable concentration of alcohols (highest alcohol level allowed by EPA in the fuel on which the vehicle is intended to operate, i.e., a "worst case" test fuel). Under current requirements, this fuel would be about 10 percent ethanol by volume. (We are retaining these Tier 2 durability requirements for the proposed evaporative emissions program.) California does not require this provision.
- Hardware:** To compensate for the increased vulnerability of system components to alcohol fuel, mfrs have indicated that they will produce a more durable evaporative emission system than the Tier 2 numerical standards would imply, using the same low permeability hoses and low loss connections and seals planned for California LEV II vehicles.

#### APPLICABILITY

- Applies to gasoline-fueled, dedicated natural gas-fueled, dedicated liquefied petroleum gas-fueled, dedicated ethanol-fueled, dedicated methanol-fueled and multi-fueled vehicles. [86.1811-09(e)(1)].

## DRAFT SUMMARY – REGULATIONS TAKE PRECEDENCE

### 3. Provisions for Small Volume Mfrs (inc. ICIs and AFVCs)

#### PROVISIONS

- Certification procedures. Covered in §86.1838-01 [86.1864-10(d)].
- Categories of businesses covered: small volume mfrs (SVMs), independent commercial importers (ICIs), and alternative fuel vehicle converters. For certification purposes, SVMs include ICIs and alternative fuel vehicle converters since they sell less than 15,000 vehicles per year.
- Phase-in flexibilities: Provided in §86.1811-04(k)(5)[86.1864-10(g)].
- Hardship provisions: SVMs may apply for up to an additional 2 years to meet the 100% phase-in requirements for cold NMHC [86.1811-04(q)(1)(viii) and (ix)] and the delayed requirement for evaporative emissions [86.1811-04(q)(1)(vi) and (vii), 86.1864-10(h)].

#### TIMING

- Cold temperature exhaust standards:
  - LDV/LLDTs: Exempt from phase-in requirements for MY 2010, 2011, and 2012, but must comply with the 100% requirement for MY 2013 and later [86.1811-04(k)(5)(vi)].
  - HLDT/MDPVs: Exempt from phase-in requirements for MY 2012, 2013, and 2014, but must comply with the 100% requirement for MY 2015 and later [86.1811-04(k)(5)(vii)]
- Evaporative emission standards:
  - LDV/LLDTs: Exempt for model years 2009 and 2010, but must comply with the Tier 2 evaporative emission standards for model years 2009 and 2010 [86.1811-04(k)(5)(iv)]. 100% compliance by model year 2011; no phase-in period.
  - HLDT/MDPVs: Exempt for model years 2010 and 2011, but must comply with the Tier 2 evaporative emission standards for model years 2010 and 2011 [86.1811-04(k)(5)(v)]. 100% compliance by model year 2012; no phase-in period.

#### SPECIAL PROVISIONS FOR INDEPENDENT COMMERCIAL IMPORTERS (ICIs)

- Timing/Phase-in: ICIs, which qualify as SVMs, are exempt from the cold temperature NMHC phase-in intermediate percentage requirements [85.1515 (c)(8)(iii)]. Nonconforming LDV/LLDTs originally manufactured in OP years 2010 and later must meet the cold temperature NMHC emission standards [85.1515(c)(8)(i)]. Nonconforming HLDTs and MDPVs originally manufactured in OP years 2012 and later must meet the cold temperature NMHC emission standards [85.1515(c)(8)(ii)].
- Evaporative Emissions:
  - Nonconforming LDV/LLDTs originally manufactured in OP years 2009 and later must meet the evaporative emission standards. However, LDV/LLDTs originally manufactured in OP years 2009 and 2010 and imported by ICIs who qualify as small SVMs are exempt from the LDV/LLDT evaporative emission standards, but must comply with the Tier 2 evaporative emission standards [85.1515 (c)(2)(vii)].
  - Nonconforming HLDTs and MDPVs originally manufactured in OP years 2010 and later must meet the evaporative emission standards. However, HLDTs and MDPVs originally manufactured in OP years 2010 and 2011 and imported by ICIs, who qualify as SVMs, are exempt from the HLDTs and MDPVs evaporative emission standards, but must comply with the Tier 2 evaporative emission standards [85.1515 (c)(2)(viii)].
- Credits, Averaging, Banking, and Trading:
  - ICIs may meet an FEL below the standards and bank or sell credits. An ICI may not meet a higher FEL than the fleet average standards, unless it demonstrates that it has obtained appropriate and sufficient NMHC credits. [85.1515 (c)(8)(iv)]
  - Where an ICI desires to obtain a certificate using a higher FEL, but does not have sufficient credits, the Administrator may issue such certificate if the ICI has also obtained a certificate of conformity for vehicles certified using a FEL lower than that required. The ICI may then import vehicles to the higher FEL only to the extent that it has generated sufficient credits from vehicles certified to a FEL lower than the fleet average standard during the same model year. [85.1515 (c)(8)(v)]
  - ICIs using FELs higher than the standards must monitor their imports so that they do not import more vehicles certified to such FELs than their available credits can cover. ICIs must not have a credit deficit at the end of a model year and are not permitted to use the deficit carryforward provisions. [85.1515 (c)(8)(vi)]

**To:** leonard.kata@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/26/2009 8:13:43 PM  
**Subject:** Car-Truck determination  
[go--no-go gage regs-diag.pdf](#)

Len,

Per your 3/26/09 voicemail, we still measure the approach angle, departure angle, ground clearance, axle clearance and calculate the breakover angle for vehicles. We request that mfrs tell us about any new trucks in their cert preview meeting. Most mfrs will provide in the cert preview meeting the logic of why they believe any new trucks meet EPA's truck definition in 40 CFR 86.1803-01 (including the 5 measurements for approach angle, departure angle, running clearance, axle clearance and breakover angle).

With that said, EPA still measures to the point of any plastic spoilers, plastic fairings, etc. We still use the aluminum plate to measure the approach angle and departure angle.

For the past few years, I have been making sure I account for the rolling radius of the tire---which usually means that I snug the plate up to the tire, then make sure there is some extra clearance between the aluminum plate and the vehicle body to account for the rolling radius effect (typically 1/2 inch to 1-1/2 inch). It's not very scientific, so I consider it a spot check.

Attached is a diagram.

Give me a call if you have questions.

Regards

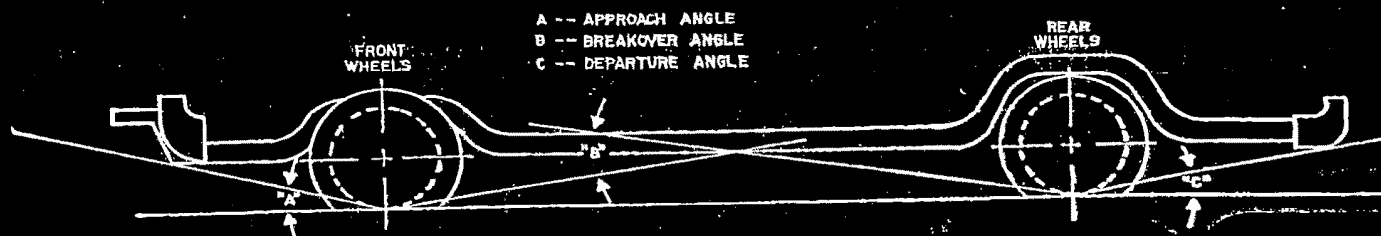


Fig. 1

[FR Doc. 76-37389 Filed 12-17-76; 8:46 am]

**To:** mike.hennard@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Tom Ball/OU=AA/O=USEPA/C=US@EPA;CN=Ross Ruske/OU=DC/O=USEPA/C=US@EPA[];  
N=Tom Ball/OU=AA/O=USEPA/C=US@EPA;CN=Ross Ruske/OU=DC/O=USEPA/C=US@EPA[]; N=Ross Ruske/OU=DC/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 4/15/2009 9:26:50 PM  
**Subject:** Re: VW 2586 Recall Report - What 2003 models are covered?  
[Volkswagen 2586 Recall Report.pdf](#)

Mike,

The 2003 certificate for test group 3VWXV02.0223 covers Golf, Jetta, Jetta Wagon, New Beetle and New Beetle Convertible models. The certif was originally issued 4/25/02 and revised on 9/5/02, adding New Beetle Convertible models.

Do you know why the attached voluntary recall/ warranty extension to 100K only applies to 2003 New Beetle Convertible models? It looks like a typo and it should actually cover 2003 Golf, Jetta, Jetta Wagon, New Beetle and New Beetle Convertible models.

Please advise.

Thanks

VW 2586 Recall Report

Michael Stephens            to:        David Good, Ross Ruske    04/15/2009 04:33 PM

Dave,

Attached is the scanned file of the VW Catalytic Converter extended warranty Recall Report. It clearly shows that for 2003 it included only the New Beetle Convertible and not the Jetta.

Sincerely,  
Michael Stephens  
EG&G Technical Services, Inc.  
E-mail: stephens.michael@epa.gov  
Phone: 734-214-4879  
Fax: 734-214-4676

# VOLKSWAGEN of America, Inc.

EPA 2586

RECEIVED

NOV 14 2007

VPCD

EDIR / VERR Coordinator  
Vehicle Program Group  
Compliance and Innovation Strategies Division  
U.S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, Michigan 48105

November 09, 2007 Date

Subject: VERR - Catalytic Converter Warranty Extension with Customer Notification

Reference: EPA Defect Report – 2007/11/09

Volkswagen of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone +1 248 754 5000  
Fax +1 248 754 4930

Dear Sir,

This information is submitted in accordance with the requirements of Part 85. 1904 –title 40 of the Code of Federal Regulations:

## 1) Description of Recalled Vehicles

Not applicable.

Description of vehicles involved in Warranty Extension program is as follows:

<u>Model Year</u>	<u>Make</u>	<u>Model</u>	<u>Engine Family</u>
2001	VW	Golf; Jetta; NB	1VWXV02.0223 ✕
		Golf; Jetta; NB	1VWXV02.0226 ✕
2002	VW	Golf; Jetta; NB	2VWXV02.0223 ✕
		Golf; Jetta; NB	2VWXV02.0222 ✕
2003	VW	NB Convertible	3VWXV02.0223 ✕

<u>Total Vehicle Populations:</u>	<b>USA:</b>	340,239
	<b>Canada:</b>	40,419

2) **A Description of the Corrective Action to be made**

Volkswagen of America, Inc. has initiated an extended warranty program for 10 years / 100,000 miles relating to catalytic converter replacements. All authorized Volkswagen dealers have been notified of this action, and owners of affected vehicles have received a notification letter that includes all needed information regarding this issue.

Dealer Notification: On or about August 27<sup>th</sup>, 2007.

Customer Notification: On or about August 29<sup>th</sup>, 2007.

Part numbers involved: 1J0 254 502T / 1J0 254 503 / 1J0 254503X

3) **A Description of the Method Used to Obtain Owner's Name and Addresses**

The R.L. Polk Recall Service is used to obtain state motor vehicle registration data as a source for customer name and address information.

4) **Description of Proper Maintenance or Eligibility Required of the Remedial Plan**

All subject vehicles will be inspected and Volkswagen of America warranty records will be reviewed by the servicing Volkswagen dealer to determine if the customer's vehicle meets the parameters of the subject warranty extension program.

5) **Description of the Remedial Procedure Including Earliest Repair Date. Remedial Time Requirement and Designated Repair Facility**

Affected authorized Volkswagen dealers have received notification and detailed repair instructions on or about August 27th, 2007.

6) **Remedial Plan by Other than Authorized Dealer**

It is anticipated that all affected vehicles will be remedied by authorized dealers of the manufacturer.

7) **Submission of Owner's Notification Letter**

Enclosed are three examples of the owner's notification letter.

8) **Description of the System Insuring Sufficient Parts**

Affected authorized Volkswagen dealers will be supplied with a sufficient quantity of parts to replace the subject Catalytic Converter through the normal Volkswagen of America parts system.

9) **Submission of Dealer Circular**

See paragraph 5

10) **A Description of Fuel Consumption or Drivability Impact**

There is no affect on fuel consumption or drivability.

11) **Sample of Label Identifying a Completed Vehicle**  
*(California Dealers only)*

Not applicable.

12) **Manufacturer's Recall Code**

There is no recall code regarding this Warranty Extension.

The Warranty Extension is identified as follows:

VW: Z1 (Warranty Extension)

Sincerely,

A large rectangular area of the document is redacted with a grey, textured pattern, obscuring the signature and any text that might have been present below the "Sincerely," line.

Attachments– 4

Cc: Tony Rinaldi – Environment Canada



**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com;CN=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Vincent  
Mazaitis/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Vincent  
Mazaitis/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Vincent  
Mazaitis/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Sat 5/2/2009 3:07:10 AM  
**Subject:** 2009 & 2010 FE Guide data for web posting - Please review & let EPA know after the  
Verify data is error free and ready for posting  
[2009-2010FEguide-VW-Audi-all rel dates04-29-09.xls](#)

Richard,

Attached is an Excel Spreadsheet with the 2009 & 2010 FE data from EPA's Verify data base as of April 29, 2009. Please review the spread sheet and confirm for your records that the data are correct. Please make sure that the release date is accurate for the models listed. Please double check any new entries into Verify to make sure they are error free. Any changes should be made directly in the Verify database. [Do not correct the spreadsheet and send it back.]

The last date to make changes is May 12, 2009. EPA will review the data on May 13 and forward it to DOE on May 14 for posting on the web on May 19, 2009.

Release Date: As you know, EPA added a "release date" field to Verify on the March 27, 2009 upgrade---so labels processed before that date did not have a release date. We request that manufacturers process a correction to your 2010 FE Labels, if needed, so that all 2010 Labels will have a release date. [You may also correct your 2009 Labels, if you like.] We will forward to DOE all 2009 model year FE Labels for web posting if the release date is blank or the release date is earlier than May 19, 2009. We will forward to DOE the 2010 model year FE Labels for web posting on May 19, 2009 only if the Label has a release date of May 19, 2009 or earlier. (We will not forward 2010 model year FE Labels to DOE if the release date is missing.)

Reminders:

1. Please double check the transmission and gas guzzler fields in the attached spreadsheet (called "Trans as listed in FE Guide (derived from col X thru AC)" and "Guzzler?" in the attached spread sheet). These fields were derived by EPA (and not directly input to Verify by manufacturers).
2. For flexible-fueled and dual fuel vehicles, please enter data for both fuels in the same model type index---by clicking on the buttons to "Add Another Fuel Usage" and "Add another Base Level Fuel Usage." Then, for example, enter the gasoline test data in "Base Level Fuel Usage #1" and the E85 test data in "Base Level Fuel Usage #2." Please don't enter the gasoline and alternative fuel data using two separate index numbers.
3. If you need to enter a basic engine descriptor (so that customers can easily identify two otherwise identical model types) please enter the descriptor in the Verify "Manufacturer Fuel Economy Label Comments" field. Please be clear and concise about the information added in the comment field, for example: Engine descriptor "4-valve" needed for this model type.

Please email me and your EPA team member when your 2009 & 2010 Verify data is "good to go" (after any needed changes or additions are made to Verify and you are sure that the Verify data is correct).

Regards

----- Forwarded by David Good/AA/USEPA/US on 05/01/2009 07:35 PM -----

Fw: 2010 FE Labels - Please use an Ethanol (E85) price of \$1.70/gal to calculate annual fuel costs for EPA's Verify data base

David Good to: Darin\_Johnson, peter\_meier, richard.thomas, dennis.reineke, thomas.hofmann, wilhelm.hall, deborah.a.zielesch, adelarosa, elarue1, rbabcock, KhanF, ogumah, vvarjabe, drobertson, skurata, alex.travis, wlewis, gary.jones, tony.dambrosi, jennifer.jasperson, murphy, balsip, gbuffali, cander44, plennvi, jcabaniss, r.maxwell, remaxwell, gambrozaitis, rseal3, kbalmer, jyarow, kenboshart, juliawinter, jcusuman, ddoku, shkim, mmpian, vdauria, doug.devries, gary.bowne, john.healey, dennis.pawlak, joan.whinihan, luis.hernandez, cjohnson, subaru-hiroyuki-shinohara, ross.gatzke, bstott, mwb, ml90, andreas.roessler, jdf14, asw9  
04/29/2009 01:42 PM

Cc: Linc Wehrly, Mary Manners, Robert Peavyhouse, hopsonjl, lij1, Ching-Shih Yang, Karen Danzeisen

To manufacturers,

In my 4/24/09 email message, I promised to provide manufacturers with an updated fuel cost for Ethanol (E85) which manufacturers can use to calculate and enter annual fuel cost information into EPA's Verify data base for 2010 FE Labels.

Please use an Ethanol (E85) fuel cost of \$1.70 per gallon. This fuel cost can be used in the interim for 2010 FE Labels until EPA provides updated 2010 fuel costs in a June/July 2009 guidance letter.

As you know, this E85 fuel cost will not be used on the FE Guide website ([www.fueleconomy.gov](http://www.fueleconomy.gov)). For [www.fueleconomy.gov](http://www.fueleconomy.gov), DOE updates the annual fuel cost information every week or so (as needed) based on nationwide average fuel costs. For example, on 4/29/09, [www.fueleconomy.gov](http://www.fueleconomy.gov) based annual fuel cost estimates on fuel costs of \$2.05 for unleaded regular gasoline, \$2.28 for unleaded premium gasoline, \$2.09 for diesel fuel and \$1.81 for E85.

If there are questions about this email, please contact me at 734-214-4450 or by email or Bob Peavyhouse at 734-214-4814 or by email.

Thanks

----- Forwarded by David Good/AA/USEPA/US on 04/29/2009 01:03 PM -----

2010 FE Guide - Schedule for May, 2009 web release on [www.fueleconomy.gov](http://www.fueleconomy.gov)

David Good to: Darin\_Johnson, peter\_meier, richard.thomas, dennis.reineke, thomas.hofmann, wilhelm.hall, deborah.a.zielesch, mwb, ml90, adelarosa, elarue1, rbabcock, KhanF, ogumah, vvarjabe, drobertson, skurata, andreas.roessler, alex.travis, wlewis, gary.jones, tony.dambrosi, jennifer.jasperson, murphy, balsip, gbuffali, cander44, plennvi, jcabaniss, r.maxwell, remaxwell, gambrozaitis, rseal3, kbalmer, jyarow, kenboshart, juliawinter, jcusuman, ddoku, shkim, mmpian, vdauria, doug.devries, gary.bowne, john.healey, dennis.pawlak, joan.whinihan, luis.hernandez, cjohnson, subaru-hiroyuki-shinohara, ross.gatzke, bstott 04/24/2009 06:24 PM

Cc: Linc Wehrly, Mary Manners, Karen Danzeisen, Ching-Shih Yang, Amy Bunker, Roberts French, hopsonjl, lij1, Robert Peavyhouse

To manufacturers,

Here's our tentative schedule for May, 2009 web update for the 2010 FE Guide. Janet Hopson, DOE thought that this schedule would be OK with them.

Date	Action
Apr 28 (Tues)	EPA Verify staff performs 2010 FE Guide Verify query (separated by mfr, etc) for EPA review
Apr 29 (Wed)	EPA sends FE Guide data to manufacturers for review & corrections; also sends prelim data to DOE [I may be 1-2 days late this year]
Apr 29-May 12	Mfrs review & make corrections
May 12 (Tues)	Last day for mfr corrections and data entry
May 13 (Wed)	EPA Verify staff performs 2010 FE Guide Verify query for EPA review
May 14 (Th)	EPA sends final data to DOE
May 19 (Tu)	DOE publishes 2010 FE Guide data on web

Reminders:

Release date for 2010 Labels: Verify added release data to the FE Label module in a March 27, 2009 update. Any 2009 and 2010 labels processed prior to March 27 did not have release date. Please do a correction in Verify for all 2010 FE labels which don't have release dates, and add in the appropriate release date. We will post the early-introduction 2010 models on the web which have release dates of May 15 or earlier. [We will not post models with missing release dates.]

Release date for 2009 Labels: For 2009 FE Labels, we intend to send all 2009 FE labels to DOE on April 29, 2009 for web posting shortly thereafter. We intend to release any 2009 FE label in EPA's Verify data base which doesn't have a release date. Please call or email me if you have an FE Label in Verify (with no release date) which you don't want to be released to the web on 4/29/09.

Minivan Classification: Please continue to use the minivan guidance provided in CISC-07-08 (and do not use the 180 cubic feet interior volume specification in the regulations).

Fuel Costs: Until new 2010 fuel costs are provided to manufacturers in a future EPA guidance letter, manufacturers should use the 2009 model year fuel cost update provided in CISC-09-08. The new 2010 fuel costs will be provided in June or July, 2009. For alternative fueled vehicles, manufacturers may use the fuel costs provided in CISC-08-10 for Hydrogen and Electricity. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG, CNG or Ethanol (E85) vehicles. I'll try to send everyone a followup email next week with the appropriate Ethanol (E85) fuel cost.

Range of comparable vehicles: Until the 2010 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2009 model year ranges provided in CISC-08-12 (except if a model exceeds the 2009 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

If you have any questions, feel free to give your team member or me a call. I'm at 734-214-4450.

Regards

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 5/4/2009 5:29:55 PM  
**Subject:** Status of Certificate for Bentley Test Group ABEXV06.0501  
<mailto:robert.hart@vw.com>

Hello Jim,

Can you tell me the status of the Certificate for Bentley Test Group ABEXV06.0501?

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com>;dennis.reineke@vw.com;CN=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts  
French/OU=AA/O=USEPA/C=US@EPA[]; ennis.reineke@vw.com;CN=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts  
French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts  
French/OU=AA/O=USEPA/C=US@EPA[]; N=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts  
French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 6/25/2009 11:16:50 PM  
**Subject:** 2010 FE Guide data for web posting - Please review & let EPA know after the Verify data is error free and ready for posting  
[2010 FEguide-Audi-VW-Lamb-Bently-w-sales-all rel dates-06-24-09.xls](#)

Richard,

Attached is an Excel Spreadsheet with the 2010 FE data from EPA's Verify data base as of June 24, 2009. Please review the spread sheet and confirm for your records that the data are correct. Please make sure that the release date is accurate for the models listed. Please double check any new entries into Verify to make sure they are error free. Any changes should be made directly in the Verify database. [Do not correct the spreadsheet and send it back.]

The last date to make changes is July 7, 2009. EPA will review the data on July 8 and forward it to DOE on July 9 for posting on the web on July 15, 2009.

Regards

----- Forwarded by David Good/AA/USEPA/US on 06/24/2009 10:19 AM -----

**From:** David Good/AA/USEPA/US  
**To:**  
**Cc:**  
**Date:** 06/19/2009 08:26 PM  
**Subject:** 2010 FE Guide - Schedule for the July, 2009 web release

To manufacturers,

Here's the schedule for the July, 2009 web update for the 2010 FE Guide at [www.fueleconomy.gov](http://www.fueleconomy.gov) & Green Vehicle Guide.

Date	Action
June 23 (Tues)	EPA staff performs 2010 FE Guide query (separated by mfr, etc) for EPA review
June 24 (Wed)	EPA sends FE Guide data to manufacturers for review & corrections
June 24-July 7	Mfrs review & make corrections

July 7 (Tues) Last day for mfr corrections and data entry  
July 7 (Wed) EPA staff performs 2010 FE Guide query for EPA review  
July 9 (Th) EPA sends final data to DOE  
July 15 (Wed) DOE publishes 2010 FE Guide data on web

Reminders:

Release date: Please be sure the release dates are correct for your 2010 FE labels. We will post the early-introduction 2010 models on the web which have release dates of July 15 or earlier. This is especially important if the Supplemental Appropriations Act of 2009 (H.R. 2346) is signed.

Transmission & Gas Guzzler Fields: Please double check the transmission and gas guzzler fields in the attached spreadsheet (called "Trans as listed in FE Guide (derived from col X thru AC)" and "Guzzler?" in the attached spreadsheet). These fields were derived by EPA (and not directly input to Verify by manufacturers).

Minivan Classification: Please continue to use the minivan guidance provided in CISC-07-08 (and do not use the 180 cubic feet interior volume specification in the regulations).

Flexible-fueled and Dual Fuel Vehicles: For flexible-fueled and dual fuel vehicles, please enter data for both fuels in the same model type index---by clicking on the buttons to "Add Another Fuel Usage" and "Add another Base Level Fuel Usage." Then, for example, enter the gasoline test data in "Base Level Fuel Usage #1" and the E85 test data in "Base Level Fuel Usage #2." Please don't enter the gasoline and alternative fuel data using two separate index numbers.

Similar Model Types which need a Basic Engine Descriptor: If you need to enter a basic engine descriptor (so that customers can easily identify two otherwise identical model types, please enter the descriptor in the Verify "Manufacturer Fuel Economy Label Comments" field. Please be clear and concise about the information added in the comment field, for example: Engine descriptor "4-valve" needed for this model type. Please be sure to re-enter that comment for any subsequent corrections or updates to that index.

Fuel Costs: Until new fuel costs are provided to manufacturers in a future EPA guidance letter, manufacturers should use the 2009-2010 model year fuel costs provided in CISC-09-08. The new fuel costs will be provided in a future EPA guidance letter in June or July, 2009.

Range of comparable vehicles: Until the 2010 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2009 model year ranges provided in CISC-08-12 (except if a model exceeds the 2009 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

Head up on Supplemental Appropriations Act of 2009 (H.R. 2346): Title XIII (Consumer Assistance to Recycle and Save Program) of this bill contains a section which provides incentives to consumers for purchasing new vehicles. [It is commonly referred to as the "Cash for Clunkers bill" in the press.] If these provisions of the bill are signed into law, we may have to make some changes to the [www.fueleconomy.gov](http://www.fueleconomy.gov) website, including updating the website more often. For example, we may have to update the 2010 models listed on [www.fueleconomy.gov](http://www.fueleconomy.gov) on a weekly basis.

If you have any questions, feel free to give your team member or me a call. I'm at 734-214-4450.

Regards

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 7/9/2009 6:31:44 PM  
**Subject:** VW Group: Two MY 2010 Bentley Test Waiver Requests  
<mailto:robert.hart@vw.com>

Hello Jim,

I just uploaded two test waiver requests for Bentley. They are related to a running change calibration to improve fuel economy for the Bentley Continental models in a carryover test group. The first one is an EDV because it is a new "worst case" exhaust emission vehicle configuration for the test group. The second configuration is an FEDV.

Please contact me if you have any questions.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>



**To:** richard.thomas@vw.com;christoph.kohnen@vw.com>[]; hristoph.kohnen@vw.com>[]  
**Cc:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 7/27/2009 4:44:47 PM  
**Subject:** 2009 & 2010 FE Guide data for web posting - Please review & correct Verify data base if necessary  
[Bugatti-ok 2009-2010-FEguide-all rel dates-w-sales1--07-22-09.xls](#)  
[Lamborghini-ok 2009-2010-FEguide-all rel dates-w-sales1--07-22-09.xls](#)  
[VW-ok 2009-2010-FEguide-all rel dates-w-sales1--07-22-09.xls](#)  
[Audi ok 2009-2010-FEguide-all rel dates-w-sales1--07-22-09.xls](#)  
[Bentley-ok 2009-2010-FEguide-all rel dates-w-sales1--07-22-09.xls](#)

Richard,

re: 2009 & 2010 FE Guide data for web posting - Please review & correct Verify data base if necessary

As you know we will be updating the [www.fueleconomy.gov](http://www.fueleconomy.gov) every week until November 1, 2009 or until the Cash-for-Clunkers program ends. Here's the latest spread sheet. Please double check and correct any errors in Verify. If you need help diagnosing the errors or need to delete any indexes, please call the EPA help line.

Regards

**To:** roberthart@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;Vanamburg.David@epamail.epa.gov[]; N=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;Vanamburg.David@epamail.epa.gov[]; anamburg.David@epamail.epa.gov[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Mon 7/27/2009 5:04:59 PM  
**Subject:** A3UC-CAF

Hello Bob,

the subject vehicle is scheduled to test on Thursday 7/30/09. I will talk with the lab on Wednesday to try to establish a time. I'll contact you as soon as I know when to expect the vehicle to be tested.

If you have any questions or concerns, please contact Jim Snyder or me.

Thanks,

Vince Mazaitis  
(734) 214-4864

**To:** robert.hart@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/5/2009 4:26:29 PM  
**Subject:** Audi Lab Test Data  
[Audi A3UC-CAF\\_US06.pdf](#)  
[Audi A3UC-CAF\\_FTP.pdf](#)  
[Audi A3UC-CAF\\_Hwy.pdf](#)

Hello Bob,

Please find enclosed the Audi Lab data without particulate measurement. We're still working on that.  
Sorry for the delays!

If you have any questions, please contact me.

Thanks Bob,

Kind regards,

Vince Mazaitis

mfr

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

### Test Information



Test Number: 2009-0210-007  
 Test Date: 7/30/2009  
 Key Start: 14:26:49  
 Fuel Container ID: F00023  
 Fuel Type: 61 Tier 2 Cert Gasoline  
 Test Procedure: 89 us062bag (us06warmup\_2bagus06)  
 Calculation Method: Gasoline  
 Pretest Remarks:

Vehicle ID: A3UC-CAF  
 MFR Name: AUDI  
 MFR Codes: 640 ADX  
 Config #: 00  
 Transmission: AUTO  
 Shift Schedule: A09980041  
 Odometer: 004874.0 MI  
 Drive Schedule: us06warmup\_2bagus06

### Bag Data

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Phase 1						
Sample	7.578	62.698	0.410	0.898	2.446	
Ambient	2.528	1.004	0.005	0.040	1.915	
Net Concentration	5.220	61.761	0.406	0.861	0.660	4.478

Remarks:

### Phase 2

Sample	5.060	46.959	0.255	1.116	2.101	
Ambient	2.500	1.027	0.005	0.040	1.924	
Net Concentration	2.768	46.018	0.251	1.079	0.339	2.387

Remarks:

### Phase 3

Sample	
Ambient	
Net Concentration	

Remarks:

### Phase 4

Sample	
Ambient	
Net Concentration	

Remarks:

### Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.107	2.547	0.025	557.9	0.016	0.091 / 0.095	15.835
Phase 2	0.025	0.835	0.007	307.5	0.004	0.021 / 0.022	28.822
Composite	0.04302	1.21477	0.01088	363.112	0.00620	(NMOG=1.04xNMHC) 0.0370 / 0.0385	

### Fuel Economy

	Gasoline MPG
Phase 1	15.81
Phase 2	28.77
Composite	24.34

### Dyno Settings

Dyno #: D329 - FWD  
 Inertia: 4250  
 EPA Set Co A: 9.67  
 EPA Set Co B: 0.217  
 EPA Set Co C: 0.016321

Emissions Bench: Mexa 7200dle

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0210-007

Vehicle ID: A3UC-CAF

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.190	4.528	0.045	991.9	0.028	0.163	1.125
Phase 2	0.155	5.197	0.042	1915.0	0.022	0.134	
Phase 3							
Phase 4							



### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.94	28.94		
Avg Cell Temp (degF)	74.37	74.36		
Dew Point (degF)	49.62	49.68		
Specific Humidity (grains/lbm)	54.59	54.71		
NOx Corr Factor	0.9125	0.9129		
CO2 Dilution Factor	14.803	11.954		
CFV Vmix (scf @68F)	2223.43	3425.64		
CVS Flow Rate Avg (scfm)	561.71	563.12		

Fan Placement: US06 Only - One Large Fan - Down - Front

Phase Time (secs)	130.01	365.00	107.51
Distance (miles)	1.778	6.228	
Bag Analysis Time (secs)	82.2	257.1	

### MFR Test Results

for Procedure 90 US06

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0395	0.7	0.012	309	0	0.0352

Odometer  
4405 M

MPG  
28.5

MPG is 17.07 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By: \_\_\_\_\_

62787

Date: \_\_\_\_\_

7/30/09

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0210-009

Vehicle ID: A3UC-CAF

### Test Information

Test Date: 7/30/2009

MFR Name: AUDI

Key Start / Hot Soak: 10:30:02 / 09:55

MFR Codes: 640

ADX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Gasoline

Transmission: AUTO

Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa

Shift Schedule: A09980005

Calculation Method: Gasoline

Odometer: 004842.0 MI

Pretest Remarks:

Drive Schedule: ftp3bag

Soak Period: 21.7 hours



### Bag Data

#### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	12.130	43.921	1.096	0.990	2.986	
Ambient	2.661	1.029	0.007	0.041	1.980	
Net Concentration	9.667	42.968	1.089	0.952	1.153	8.369

Remarks: No PM data available at this time

#### Phase 2

Sample	2.682	9.693	0.125	0.669	1.883	
Ambient	2.631	0.000	0.003	0.041	1.990	
Net Concentration	0.182	9.693	0.122	0.630	-0.007	0.182

Remarks:

#### Phase 3

Sample	3.050	9.716	0.372	0.881	1.900	
Ambient	2.638	0.000	0.005	0.040	1.976	
Net Concentration	0.586	9.716	0.367	0.843	0.054	0.524

Remarks:

#### Phase 4

Sample	
Ambient	
Net Concentration	

Remarks: This test has particulate results.

### Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.123	1.107	0.042	385.4	0.017	0.107 / 0.111	22.974
Phase 2	0.004	0.399	0.007	407.8	0.000	0.004 / 0.004	21.800
Phase 3	0.007	0.250	0.014	340.8	0.001	0.007 / 0.007	26.096
Weighted	0.02957	0.50489	0.01644	384.688	0.00375	(NMOG=1.04xNMHC) 0.0259 / 0.0270	

### Fuel Economy

	Gasoline MPG	No PM data avai	Dyno Settings	Dyno #: D329 - FWD
Phase 1	22.93			Inertia: 4250
Phase 2	21.76			EPA Set Co A: 9.67
Phase 3	26.05			EPA Set Co B: 0.217
Weighted	23.03			EPA Set Co C: 0.016321
				Emissions Bench: Mexa 7200die

v090530 - d329 EPAVDAEm090730100244

Page 1 of 2

Print Time 04-Aug-2009 16:38

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0210-009

Vehicle ID: A3UC-CAF

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.443	3.980	0.150	1385.6	0.061	0.384	1.125
Phase 2	0.014	1.538	0.029	1571.6	0.000	0.014	
Phase 3	0.027	0.898	0.051	1224.6	0.003	0.024	
Phase 4							



### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.96	28.97	28.97	
Avg Cell Temp (degF)	75.26	75.29	75.47	
Dew Point (degF)	49.14	49.07	49.13	
Specific Humidity (grains/lbm)	53.58	53.41	53.55	
NOx Corr Factor	0.9085	0.9079	0.9084	
CO2 Dilution Factor	13.460	19.993	15.189	
CFV Vmix (scf @68F)	2809.41	4811.59	2802.87	
Total Vmix (scf@68F)	2809.41	4811.59	2802.87	

CVS Flow Rate Avg (scfm) 332.28 331.72 331.70

Fan Placement: One Fan - Up - Front

Phase Time (secs)	507.30	870.30	507.00
Distance (miles)	3.595	3.854	3.594
Bag Analysis Time (secs)	951.4	148.5	89.6

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0199	0.43	0.017	351	0	0.0172

Odometer  
4374 M

MPG  
25.1

MPG is 8.99 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By:

21366

Date:

8/4/09

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0210-006

Vehicle ID: A3UC-CAF

### Test Information

Test Date: 7/30/2009

MFR Name: AUDI

Key Start: 13:25:03

MFR Codes: 640

ADX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Gasoline

Transmission: AUTO

Test Procedure: 03 HWFET (hwfetprep\_hwfet)

Shift Schedule: A09980011

Calculation Method: Gasoline

Odometer: 004853.0 MI

Pretest Remarks:

Drive Schedule: hwfet\_hwfet



### Bag Data

#### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	4.116	28.784	0.147	1.111	2.007	
Ambient	2.667	1.064	0.007	0.040	1.942	
Net Concentration	1.671	27.809	0.141	1.075	0.226	1.416

Remarks: No PM data available at this time

#### Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

#### Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

#### Phase 4

Sample  
Ambient  
Net Concentration

Remarks: This test has particulate results.

### Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.011	0.375	0.003	227.6	0.002	0.009 / 0.010	39.006

(NMOG=1.04xNMHC)

### Fuel Economy

Gasoline MPG

No PM data avai

Dyno Settings

Dyno #: D329 - FWD

Phase 1 38.93

Inertia: 4250

EPA Set Co A: 9.67

EPA Set Co B: 0.217

EPA Set Co C: 0.016321

Emissions Bench: Mexa 7200dle



# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0210-006

Vehicle ID: A3UC-CAF

Results	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.115	3.851	0.029	2339.0	0.018	0.097	1.125
Phase 2							
Phase 3							
Phase 4							



### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.96			
Avg Cell Temp (degF)	75.40			
Dew Point (degF)	50.43			
Specific Humidity (grains/lbm)	56.25			
NOx Corr Factor	0.9190			
CO2 Dilution Factor	12.021			
CFV Vmix (scf @68F)	4200.65			
Total Vmix (scf@68F)	4200.65			
CVS Flow Rate Avg (scfm)	329.46			

Fan Placement: One Fan - Down - Front  
Phase Time (secs) 765.01  
Distance (miles) 10.276  
Bag Analysis Time (secs) 311.6

### MFR Test Results

for Procedure 3 HWFE

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.011	0.35	0.004	216	0	0.009

Odometer  
4385 M

MPG  
40.8

MPG is 4.79 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By:

21366

Date:

8/4/09

**To:** robert.hart@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/6/2009 1:20:35 PM  
**Subject:** 756-0-0012-10  
[VW 756-0-0012-10 US06.pdf](#)  
[VW 756-0-0012-10 FTP.pdf](#)  
[VW 756-0-0012-10 Hwy.pdf](#)

Good morning again Bob,

Please find enclosed the Lab test results for the subject vehicle. If you have any questions or concerns, please contact me.

Thanks Bob,

Kind regards,

Vince Mazaitis

CERT

## NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0229-006

Vehicle ID: 756 0-0012/10

## Test Information



Test Date: 8/5/2009

MFR Name: VOLKSWAGEN

Key Start: 11:04:59

MFR Codes: 590 VWX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Gasoline

Transmission: AUTO

Test Procedure: 89 us062bag (us06warmup\_2bagus06)

Shift Schedule: A09980041

Calculation Method: Gasoline

Odometer: 004436.0 MI

Pretest Remarks:

Drive Schedule: us06warmup\_2bagus06

## Bag Data

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
<b>Phase 1</b>						
Sample	9.791	229.148	0.491	0.915	3.225	
Ambient	3.110	0.013	0.006	0.044	1.876	
Net Concentration	6.900	229.135	0.485	0.875	1.480	5.217

Remarks:

## Phase 2

Sample	6.591	118.420	0.348	1.230	2.357	
Ambient	3.123	0.219	0.016	0.045	1.877	
Net Concentration	3.758	118.221	0.333	1.189	0.654	3.015

Remarks:

## Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

## Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.193	12.949	0.041	776.6	0.048	0.146 / 0.152	11.163
Phase 2	0.046	2.896	0.012	457.9	0.009	0.037 / 0.038	19.245

Composite 0.07818 5.11628 0.01841 528.303 0.01773 0.0607 / 0.0632 (NMOG=1.04xNMHC)

## Fuel Economy

## Gasoline MPG

## Dyno Settings

Dyno #: D002

Phase 1 11.14

Inertia: 5500

Phase 2 19.21

EPA Set Co A: 18.2

EPA Set Co B: 0.08

EPA Set Co C: 0.0302

Composite 16.57

Emissions Bench: D002

v090530 - d002

EPAVDAEm090805104047

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Print Time 05-Aug-2009 11:24

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2009-0229-006				Vehicle ID: 756 0-0012/10			
<b>Results</b>	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	1.137
Phase 1	0.342	22.932	0.072	1375.3	0.085	0.259	
Phase 2	0.285	18.096	0.076	2861.2	0.057	0.229	
Phase 3							
Phase 4							

<u>Test Conditions</u>	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.14	29.14		
Avg Cell Temp (degF)	76.67	76.73		
Dew Point (degF)	48.54	48.56		
Specific Humidity (grains/lbm)	52.04	52.07		
NOx Corr Factor	0.9026	0.9027		
CO2 Dilution Factor	14.265	10.782		
CFV Vmix (scf @68F)	3035.45	4642.79		
CVS Flow Rate Avg (scfm)	767.82	763.20		
Fan Placement: USO6 Only - One Large Fan - Down - Front				
Phase Time (secs)	130.00	365.00	107.21	
Distance (miles)	1.771	6.248		
Bag Analysis Time (secs)	84.8	271.3		

**MFR Test Results** for Procedure 90 US06

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0242	1.69	0.016	495	0	0.0184

Odometer      MPG

4193 M      17.8

MFR Lab: Volkswagen AG, Dept EASZ/1

MPG is 7.42 % higher than EPA MPG

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

Road load ABC, zero span/s, Tail pipe BP OK 05-8-09

I have validated the data in accordance with the requirements of TP 730

Validated By:

Date: 8-5-09

CERT

CVS

## NVFEL Laboratory Test Data

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0229-004

Vehicle ID: 756 0-0012/10

## Test Information



Test Date: 8/5/2009

MFR Name: VOLKSWAGEN

Key Start / Hot Soak: 08:59:04 / 09:55

MFR Codes: 590

VWX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Gasoline

Transmission: AUTO

Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa)

Shift Schedule: A09980005

Calculation Method: Gasoline

Odometer: 004405.0 MI

Pretest Remarks:

Drive Schedule: ftp3bag

Soak Period: 22.6 hours

## Bag Data

## Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	9.197	18.119	0.924	0.855	2.484	
Ambient	3.302	0.269	0.028	0.043	1.905	
Net Concentration	6.107	17.868	0.898	0.815	0.701	5.309

Remarks:

## Phase 2

Sample	3.237	0.867	0.155	0.566	1.862	
Ambient	3.234	0.216	0.015	0.041	1.880	
Net Concentration	0.140	0.659	0.141	0.526	0.061	0.070

Remarks:

## Phase 3

Sample	4.134	1.883	0.813	0.754	2.100	
Ambient	3.594	0.259	0.016	0.041	1.874	
Net Concentration	0.742	1.638	0.798	0.716	0.331	0.366

Remarks:

## Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.131	0.772	0.057	553.9	0.017	0.114 / 0.118	16.027
Phase 2	0.005	0.045	0.014	568.4	0.002	0.002 / 0.002	15.660
Phase 3	0.016	0.070	0.051	483.3	0.008	0.008 / 0.008	18.414
Weighted	0.03389	0.20286	0.03326	542.030	0.00709	(NMOG=1.04xNMHC) 0.0269 / 0.0280	

## Fuel Economy

## Gasoline MPG

## Dyno Settings

Dyno #: D002

Phase 1 16.00  
Phase 2 15.63  
Phase 3 18.38

Inertia: 5500  
EPA Set Co A: 18.2  
EPA Set Co B: 0.08  
EPA Set Co C: 0.0302

Weighted 16.38

Emissions Bench: D002

v090530 - d002

EPAVDAEm090805084352

Page 1 of 2

Print Time 05-Aug-2009 09:50

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0229-004

Vehicle ID: 756 0-0012/10

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	1.137
Phase 1	0.470	2.777	0.206	1991.7	0.062	0.409	
Phase 2	0.018	0.175	0.056	2198.1	0.009	0.009	
Phase 3	0.057	0.254	0.183	1741.1	0.029	0.028	
Phase 4							



## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.13	29.14	29.14	
Avg Cell Temp (degF)	75.46	75.61	75.60	
Dew Point (degF)	47.89	48.44	48.26	
Specific Humidity (grains/lbm)	50.79	51.85	51.49	
NOx Corr Factor	0.8978	0.9019	0.9005	
CO2 Dilution Factor	15.616	23.675	17.753	
CFV Vmix (scf @68F)	4714.48	8065.82	4694.35	
CVS Flow Rate Avg (scfm)	557.60	555.94	555.43	
Fan Placement: One Fan - Down - Front				
Phase Time (secs)	507.30	870.50	507.10	
Distance (miles)	3.596	3.867	3.602	
Bag Analysis Time (secs)	81.1	75.4	75.4	

## MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0287	0.21	0.033	509	0	0.0229

Odometer  
4161 M

MPG  
17.4

MFR Lab: Volkswagen AG, Dept EASZ/1

MPG is 6.21 % higher than EPA MPG

Dyno: 21


Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By:

Date:

CERT

NVFEL Laboratory Test Data							CVS																																																																																																																																																																																																																																									
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<div style="display: flex; justify-content: space-between;"> <div style="width: 15%;">  </div> <div style="width: 45%;"> <b>Test Information</b>            Test Date: 8/5/2009            Key Start: 10:14:23            Fuel Container ID: F00023            Fuel Type: 61 Tier 2 Cert Gasoline            Test Procedure: 03 HWFET (hwfetprep_hwfet)            Calculation Method: Gasoline            Pretest Remarks:         </div> <div style="width: 40%;">           MFR Name: VOLKSWAGEN            MFR Codes: 590 VWX            Config #: 00            Transmission: AUTO            Shift Schedule: A09980011            Odometer: 004416.0 MI            Drive Schedule: hwfet_hwfet         </div> </div>																																																																																																																																																																																																																																																
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# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0229-005

Vehicle ID: 756 0-0012/10

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.046	0.382	0.039	3608.1	0.024	0.023	1.137
Phase 2							
Phase 3							
Phase 4							



## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.14			
Avg Cell Temp (degF)	75.98			
Dew Point (degF)	49.00			
Specific Humidity (grains/lbm)	52.95			
NOx Corr Factor	0.9061			
CO2 Dilution Factor	8.991			
CFV Vmix (scf @68F)	4799.59			

CVS Flow Rate Avg (scfm) 376.44

Fan Placement: One Fan - Down - Front  
 Phase Time (secs) 1057.20  
 Distance (miles) 10.273  
 Bag Analysis Time (secs) 77.4

## MFR Test Results

for Procedure 3 HWFE

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0014	0.02	0.005	323	0	0.0003

Odometer 4172 M  
 MPG 27.4

MFR Lab: Volkswagen AG, Dept EASZ/1

MPG is 8.32 % higher than EPA MPG

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By: *[Signature]*

Date: *8-5-09*



**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/6/2009 6:04:05 PM  
**Subject:** Re: Confirmatory Test Results for Jetta - VW35100052/10  
[VW Jetta US06.pdf](#)  
[Jetta FTP.pdf](#)  
[VW Jetta Hwy.pdf](#)  
<mailto:robert.hart@vw.com>

Hello Bob,

Please find enclosed the Jetta Lab results. Note the fuel economy was > 3% for the Hwy. (EPA fuel economy was larger). As you know, your options are to accept the Manufacturers fuel economy values or retest the Highway. If you have any questions or concerns, please contact Jim Snyder or me.

Thanks Bob,

Vince Mazaitis

**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Date:** 08/06/2009 11:48 AM  
**Subject:** Confirmatory Test Results for Jetta - VW35100052/10

Hello Vince,

I just realized that the test results are probably going to the person that submitted the original test waiver request. For the Jetta that would be Bill Rodgers and he is on vacation. Please send a copy of the results to me.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

CERT  
CVS

# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2009-0236-003

Vehicle ID: VW35100052/10

## Test Information



Test Date: 8/5/2009

Key Start: 14:40:27

Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Gasoline

Test Procedure: 89 us062bag (us06warmup\_2bagus06)

Calculation Method: Gasoline

Pretest Remarks:

MFR Name: VOLKSWAGEN

MFR Codes: 590 VWX

Config #: 03

Transmission: AUTO

Shift Schedule: A09980041

Odometer: 004846.0 MI

Drive Schedule: us06warmup\_2bagus06

## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	5.448	8.677	0.676	0.731	2.236	
Ambient	3.573	0.306	0.002	0.041	1.862	
Net Concentration	2.071	8.388	0.674	0.693	0.476	1.530

Remarks:

### Phase 2

Sample	5.092	11.933	0.279	1.038	2.235	
Ambient	3.603	0.319	0.010	0.041	1.861	
Net Concentration	1.769	11.639	0.270	1.000	0.518	1.179

Remarks:

### Phase 3

Sample	
Ambient	
Net Concentration	

Remarks:

### Phase 4

Sample	
Ambient	
Net Concentration	

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.044	0.360	0.043	467.0	0.012	0.033 / 0.034	19.036
Phase 2	0.015	0.203	0.007	273.9	0.005	0.010 / 0.011	32.466
Composite	0.02167	0.23781	0.01502	316.932	0.00663	(NMOG=1.04xNMHC) 0.0152 / 0.0158	

## Fuel Economy


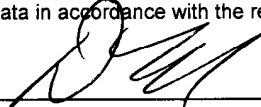
	Gasoline MPG	Dyno Settings	Dyno #:
Phase 1	19.00		D002
Phase 2	32.41		Inertia: 3250
			EPA Set Co A: -2.96
			EPA Set Co B: 0.2131
			EPA Set Co C: 0.01754
Composite	27.99		Emissions Bench: D002

v090530 - d002


EPAVDAEm090805140921


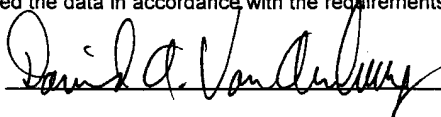
Page 1 of 2

Print Time 05-Aug-2009 15:02


NVFEL Laboratory Test Data							CVS	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2009-0236-003				Vehicle ID: VW35100052/10				
<b>Results</b>		<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
	Phase 1	0.079	0.643	0.077	835.0	0.021	0.058	1.137
	Phase 2	0.095	1.264	0.044	1706.2	0.032	0.063	
	Phase 3							
	Phase 4							
<b>Test Conditions</b>								
		<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
	Barometer (inHg)	29.13	29.13					
	Avg Cell Temp (degF)	75.57	75.25					
	Dew Point (degF)	49.06	48.57					
	Specific Humidity (grains/lbm)	53.10	52.12					
	NOx Corr Factor	0.9067	0.9029					
	CO2 Dilution Factor	18.286	12.889					
	CFV Vmix (scf @68F)	2326.38	3292.68					
	CVS Flow Rate Avg (scfm)	545.03	541.41					
	Fan Placement: US06 Only - One Large Fan - Up - Front							
	Phase Time (secs)	130.00	364.90	126.11				
	Distance (miles)	1.788	6.230					
	Bag Analysis Time (secs)	82.3	289.6					
<b>MFR Test Results</b> for Procedure 90 US06								
	<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
	1E+07	0.0191	0.309	0.0159	309	0	0.012	
	<u>Odometer</u>	<u>MPG</u>						
	4690 M	28.5						
	MPG is 1.81 % higher than EPA MPG							
	MFR Lab: Volkswagen AG, Dept EASZ/1							
	Dyno: 21							
	Fuel: 61 Tier 2 Cert Gasoline							
	I have validated the data in accordance with the requirements of TP 730							
	Validated By: 						Date: 8-5-09	

CERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2009-0236-001		Vehicle ID: VW35100052/10					
	Test Date: 8/5/2009		MFR Name: VOLKSWAGEN				
	Key Start / Hot Soak: 12:36:44 / 09:59		MFR Codes: 590 VWX				
	Fuel Container ID: F00023		Config #: 03				
	Fuel Type: 61 Tier 2 Cert Gasoline		Transmission: AUTO				
	Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa)		Shift Schedule: A09980005				
	Calculation Method: Gasoline		Odometer: 004815.0 MI				
Pretest Remarks:		Drive Schedule: ftp3bag					
		Soak Period: 21.9 hours					
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	19.106	63.856	0.913	0.698	2.703		
Ambient	3.001	0.287	0.000	0.041	1.874		
Net Concentration	16.263	63.585	0.913	0.659	0.928	15.208	
Remarks:							
<b>Phase 2</b>							
Sample	2.973	1.561	0.002	0.457	1.813		
Ambient	2.974	0.229	0.000	0.040	1.858		
Net Concentration	0.100	1.340	0.002	0.418	0.018	0.079	
Remarks:							
<b>Phase 3</b>							
Sample	3.034	4.357	0.110	0.624	1.868		
Ambient	2.911	0.267	0.004	0.040	1.859		
Net Concentration	0.259	4.102	0.106	0.585	0.096	0.150	
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.243	1.915	0.041	311.9	0.016	0.227 / 0.236	28.200
Phase 2	0.002	0.065	0.000	316.7	0.001	0.002 / 0.002	28.099
Phase 3	0.004	0.123	0.005	275.5	0.002	0.002 / 0.002	32.297
Weighted	0.05268	0.46496	0.00980	304.365	0.00404	(NMOG=1.04xNMHC) 0.0487 / 0.0507	
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	28.15	Dyno #: D002					
Phase 2	28.05	Inertia: 3250					
Phase 3	32.24	EPA Set Co A: -2.96					
		EPA Set Co B: 0.2131					
		EPA Set Co C: 0.01754					
Weighted	29.15	Emissions Bench: D002					

NVFEL Laboratory Test Data							CVS	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2009-0236-001				Vehicle ID: VW35100052/10				
	<b>Results</b>	<b>HC-FID</b> (grams)	<b>CO</b> (grams)	<b>NOx</b> (grams)	<b>CO2</b> (grams)	<b>CH4</b> (grams)	<b>NMHC</b> (grams)	<b>Meth Response</b>
	Phase 1	0.867	6.842	0.145	1114.6	0.057	0.811	1.137
	Phase 2	0.009	0.247	0.000	1211.4	0.002	0.007	
	Phase 3	0.014	0.440	0.017	986.1	0.006	0.008	
	Phase 4							
<b>Test Conditions</b>		<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
Barometer (inHg)		29.15	29.14	29.14				
Avg Cell Temp (degF)		75.52	75.63	75.75				
Dew Point (degF)		48.44	48.14	48.46				
Specific Humidity (grains/lbm)		51.83	51.25	51.89				
NOx Corr Factor		0.9018	0.8996	0.9020				
CO2 Dilution Factor		18.978	29.307	21.463				
CFV Vmix (scf @68F)		3263.87	5595.22	3252.60				
CVS Flow Rate Avg (scfm)		386.03	385.08	384.62				
Fan Placement: One Fan - Up - Front								
Phase Time (secs)		507.30	871.80	507.40				
Distance (miles)		3.573	3.825	3.580				
Bag Analysis Time (secs)		79.1	75.4	75.4				
<b>MFR Test Results</b> for Procedure 21 Federal fuel 2-day exhaust (w/can load)								
<u>MFR Number</u> 1E+07	<u>HC</u> 0.047	<u>CO</u> 0.455	<u>NOx</u> 0.0111	<u>CO2</u> 310	<u>NMOG</u> 0	<u>NonMeth HC</u> 0.0434		
<u>Odometer</u> 4658 M	<u>MPG</u> 28.4				MFR Lab: Volkswagen AG, Dept EASZ/1			
MPG is -2.56 % lower than EPA MPG					Dyno: 21			
					Fuel: 61 Tier 2 Cert Gasoline			
I have validated the data in accordance with the requirements of TP 730								
Validated By: 		Date: 8-5-09						

CERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
		Test Number: 2009-0236-002		Vehicle ID: VW35100052/10			
		Test Date: 8/5/2009		MFR Name: VOLKSWAGEN			
		Key Start: 13:51:07		MFR Codes: 590 VWX			
		Fuel Container ID: F00023		Config #: 03			
		Fuel Type: 61 Tier 2 Cert Gasoline		Transmission: AUTO			
Test Procedure: 03 HWFET (hwfetprep_hwfet)		Shift Schedule: A09980011					
Calculation Method: Gasoline		Odometer: 004826.0 MI					
Pretest Remarks:		Drive Schedule: hwfet_hwfet					
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
<b>Phase 1</b>							
Sample	4.208	12.664	0.349	1.396	2.129		
Ambient	3.285	1.018	0.013	0.042	1.858		
Net Concentration	1.265	11.753	0.337	1.358	0.465	0.736	
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.006	0.115	0.005	209.4	0.003	0.004 / 0.004	42.467
(NMOG=1.04xNMHC)							
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>				<u>Dyno Settings</u>	<u>Dyno #:</u> D002	
Phase 1	42.39			19.15		Inertia: 3250	
				19.20		EPA Set Co A: -2.96	
				19.24		EPA Set Co B: 0.2131	
						EPA Set Co C: 0.01754	
				19.19		Emissions Bench: D002	

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2009-0236-002				Vehicle ID: VW35100052/10			
<b>Results</b>	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.063	1.182	0.050	2146.0	0.027	0.037	1.137
Phase 2							
Phase 3							
Phase 4							

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.14			
Avg Cell Temp (degF)	75.69			
Dew Point (degF)	48.67			
Specific Humidity (grains/lbm)	52.30			
NOx Corr Factor	0.9036			
CO2 Dilution Factor	9.591			
CFV Vmix (scf @68F)	3050.75			
 CVS Flow Rate Avg (scfm)	 239.27			
 Fan Placement: One Fan - Up - Front				
Phase Time (secs)	1057.20			
Distance (miles)	10.246			
Bag Analysis Time (secs)	77.4			

**MFR Test Results** for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.003	0.148	0.0034	219	0	0.0021

Odometer  
4669 M

MPG  
40.3

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

MPG is -4.93 % lower than EPA MPG

*And load ABC, verspan 15, tail pipe BP OK 8-5-09*

I have validated the data in accordance with the requirements of TP 730

Validated By: *[Signature]*

Date: *8-5-09*



**To:**

doug.devries@gm.com;laura.l.parker@gm.com;gheiser@ford.com;elarue1@ford.com;jcusuman@ford.com;jdf14@chrysler.com;asw9@chrysler.com;KhanF@NRD.NISSAN-USA.COM;ogumah@ntcna.nissan-usa.com;richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
aura.l.parker@gm.com;gheiser@ford.com;elarue1@ford.com;jcusuman@ford.com;jdf14@chrysler.com;asw9@chrysler.com;KhanF@NRD.NISSAN-USA.COM;ogumah@ntcna.nissan-usa.com;richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
heiser@ford.com;elarue1@ford.com;jcusuman@ford.com;jdf14@chrysler.com;asw9@chrysler.com;KhanF@NRD.NISSAN-USA.COM;ogumah@ntcna.nissan-usa.com;richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
larue1@ford.com;jcusuman@ford.com;jdf14@chrysler.com;asw9@chrysler.com;KhanF@NRD.NISSAN-USA.COM;ogumah@ntcna.nissan-usa.com;richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
cusuman@ford.com;jdf14@chrysler.com;asw9@chrysler.com;KhanF@NRD.NISSAN-USA.COM;ogumah@ntcna.nissan-usa.com;richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
df14@chrysler.com;asw9@chrysler.com;KhanF@NRD.NISSAN-USA.COM;ogumah@ntcna.nissan-usa.com;richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
sw9@chrysler.com;KhanF@NRD.NISSAN-USA.COM;ogumah@ntcna.nissan-usa.com;richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
hanF@NRD.NISSAN-USA.COM;ogumah@ntcna.nissan-usa.com;richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
gumah@ntcna.nissan-usa.com;richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
richard.thomas@vw.com;christoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
hristoph.kohnen@vw.com>;shaun.roopnarine@mbusa.com;john.healey@mbusa.com[];  
haun.roopnarine@mbusa.com;john.healey@mbusa.com[]; ohn.healey@mbusa.com[]

**Cc:** CN=Mary Manners/OU=AA/O=USEPA/C=US@EPA;CN=Holly

Pugliese/OU=AA/O=USEPA/C=US@EPA;CN=Christine  
Mikolajczyk/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Ball/OU=AA/O=USEPA/C=US@EPA;CN=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ching-Shih  
Yang/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Holly  
Pugliese/OU=AA/O=USEPA/C=US@EPA;CN=Christine  
Mikolajczyk/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Ball/OU=AA/O=USEPA/C=US@EPA;CN=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ching-Shih  
Yang/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Christine  
Mikolajczyk/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Ball/OU=AA/O=USEPA/C=US@EPA;CN=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ching-Shih  
Yang/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Joel  
Ball/OU=AA/O=USEPA/C=US@EPA;CN=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ching-Shih

Yang/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ching-Shih  
Yang/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Ching-Shih  
Yang/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/7/2009 2:24:24 PM  
**Subject:** Fw: Help with the Cas for clunkers - round 3 - Please respond with answers to our questions or the missing data in the attached spread sheet  
[OEM question list 08 07 2009.xls](#)

All,

Please call or email me if you have questions. We need answers by Monday 8/10/09 or earlier---if possible.

Thanks

Dave

----- Forwarded by David Good/AA/USEPA/US on 08/07/2009 10:18 AM -----

From: Jim Snyder/AA/USEPA/US  
To: David Good/AA/USEPA/US@EPA, Ching-Shih Yang/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA  
Date: 08/07/2009 09:44 AM  
Subject: questions for OEMS

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com>; CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA; CN=Mary Manners/OU=AA/O=USEPA/C=US@EPA; CN=Holly Pugliese/OU=AA/O=USEPA/C=US@EPA; CN=Christine Mikolajczyk/OU=AA/O=USEPA/C=US@EPA; CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA; CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA; CN=Ching-Shih Yang/OU=AA/O=USEPA/C=US@EPA; CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA; CN=Mary Manners/OU=AA/O=USEPA/C=US@EPA; CN=Holly Pugliese/OU=AA/O=USEPA/C=US@EPA; CN=Christine Mikolajczyk/OU=AA/O=USEPA/C=US@EPA; CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA; CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA; CN=Ching-Shih Yang/OU=AA/O=USEPA/C=US@EPA; CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Mary Manners/OU=AA/O=USEPA/C=US@EPA; CN=Holly Pugliese/OU=AA/O=USEPA/C=US@EPA; CN=Christine Mikolajczyk/OU=AA/O=USEPA/C=US@EPA; CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA; CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA; CN=Ching-Shih Yang/OU=AA/O=USEPA/C=US@EPA; CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Holly Pugliese/OU=AA/O=USEPA/C=US@EPA; CN=Christine Mikolajczyk/OU=AA/O=USEPA/C=US@EPA; CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA; CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA; CN=Ching-Shih Yang/OU=AA/O=USEPA/C=US@EPA; CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Christine Mikolajczyk/OU=AA/O=USEPA/C=US@EPA; CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA; CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA; CN=Ching-Shih Yang/OU=AA/O=USEPA/C=US@EPA; CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA; CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA; CN=Ching-Shih Yang/OU=AA/O=USEPA/C=US@EPA; CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA; CN=Ching-Shih Yang/OU=AA/O=USEPA/C=US@EPA; CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Ching-Shih Yang/OU=AA/O=USEPA/C=US@EPA; CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/7/2009 6:47:52 PM

**Subject:** re: 2009 & 2010 FE Guide data for web posting - Please review & correct Verify data base if necessary

VW 2009-2010FEguide-all rel dates-w sales-8-5-09.xls

Audi 2009-2010FEguide-all rel dates-w sales-8-5-09.xls

Bentley 2009-2010FEguide-all rel dates-w sales-8-5-09.xls

Bugatti 2009-2010FEguide-all rel dates-w sales-8-5-09.xls

Lamborghini 2009-2010FEguide-all rel dates-w sales-8-5-09.xls

Richard,

re: 2009 & 2010 FE Guide data for web posting - Please review & correct Verify data base if necessary

As you know we will be updating the [www.fueleconomy.gov](http://www.fueleconomy.gov) every week until the Cash-for-Clunkers program ends. Here's the latest spread sheet. Please double check and correct any errors in Verify. If you need help diagnosing the errors or need to delete any indexes, please call the EPA help line.

Regards

**To:** richard.thomas@vw.com[]  
**Cc:** "Hopson, Janet L." [hopsonjl@ornl.gov]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/20/2009 3:59:32 PM  
**Subject:** RE: Please add 2009 Audi A6 3.1L Auto(AV) to www.fueleconomy.gov and cars.gov if possible [Need unadj city/hwy/comb mpg values]

Richard,

Please send Janet & all of us the unadjusted city, hwy and combined mpg values for this vehicle.

Thanks

From: "Hopson, Janet L." <hopsonjl@ornl.gov>  
To: David Good/AA/USEPA/US@EPA  
Date: 08/20/2009 10:45 AM  
Subject: RE: Please add 2009 Audi A6 3.1L Auto(AV) to www.fueleconomy.gov and cars.gov if possible

We'll fix this. Any chance we could get the unadjusted numbers?

Janet

-----Original Message-----

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Thursday, August 20, 2009 10:39 AM  
To: Hopson, Janet L.  
Cc: Li, Jia; Snyder.Jim@epamail.epa.gov; richard.thomas@vw.com  
Subject: Please add 2009 Audi A6 3.1L Auto(AV) to www.fueleconomy.gov and cars.gov if possible

Janet,

Here's one which slipped thru the cracks. The data was partially in our old CFEIS data base and partially in our new Verify data base. If possible can you put it on the web?

[Note: The other A6 and Q5 models in the pdf should already be on the web.]

Thanks

Dave

----- Forwarded by David Good/AA/USEPA/US on 08/20/2009 10:32 AM -----

From: Debra Piper/AA/USEPA/US  
To: David Good/AA/USEPA/US@EPA  
Date: 08/20/2009 08:44 AM

Subject: Scan of chart for VW

(See attached file: Volkswagon Economy Guide.pdf)

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;healy.stephen@epa.gov;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com[]; ealy.stephen@epa.gov;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com[]; eonard.Kata@vw.com[]  
**Cc:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/21/2009 8:10:13 PM  
**Subject:** Invitation: VW - Hybrid & MSAT issues (Sep 24 02:30 PM EDT in AA-601D/AA-OTAQ-LAB@EPA)

**To:** christoph.kohnen@vw.com>;richard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; ichard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** richard.thomas@vw.com;john.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; ohn.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; lan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; erry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 10/5/2009 7:17:13 PM  
**Subject:** EPA CAFE letter & calculation attached - 2008 Volkswagen IP  
[2008-0590-IP-CAFE.pdf](#)

This e-mail message forwards a signed EPA letter and Corporate Average Fuel Economy (CAFE) calculation to your office.

CONFIDENTIALITY: The cover letter and the summary information on the "CAFE report" page are not confidential. However, the information included in the calculation section of the attached PDF file contain sales information in more detail than is normally available to competitors and to the general public. Release of the calculation section of this PDF file is not authorized.

This e-mail and the Adobe Acrobat (.pdf) attachment are an official Agency action. If there is a problem with the attachment or if you are not the intended recipient, please contact your certification team representative immediately. Adobe Acrobat Reader version 5.0 or later is required to open the attached PDF document(s).



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 10/15/2009 8:07:16 PM  
**Subject:** VW Group: Cold NMHC Updates  
<mailto:robert.hart@vw.com>

Hello Jim,

I just realized that I did not inform you when I uploaded the MY 2009 application updates to add the Cold NMHC compliance text.

I finished them on Monday. The test results are in Section 7 on the Federal page for Cold CO as you requested.

Here is a list of the files that were uploaded.

CBI\_9VWXB\_COMMON\_APP\_UPD\_R01.PDF  
CBI\_9AD XV02.03PA\_APP\_UPD\_R01.PDF  
CBI\_9AD XV02.03UA\_APP\_UPD\_R01.PDF  
CBI\_9AD XV02.03UB\_APP\_UPD\_R01.PDF

The FOI copies of the same files were also uploaded.

Let me know if you have any questions.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

**To:** eeo@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** john.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;richard.thomas@vw.com[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;richard.thomas@vw.com[]; N=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;richard.thomas@vw.com[]; lan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;richard.thomas@vw.com[]; N=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;richard.thomas@vw.com[]; arry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;richard.thomas@vw.com[]; erry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;richard.thomas@vw.com[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;christoph.kohnen@vw.com;richard.thomas@vw.com[]; hristoph.kohnen@vw.com;richard.thomas@vw.com[]; ichard.thomas@vw.com[]  
**From:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA  
**Sent:** Thur 10/29/2009 2:43:35 PM  
**Subject:** Re: EPA CAFE letter & calculation attached - 2008 Volkswagen LT (V1.23)  
[2008-0590-LT-CAFE-V123.pdf](#)

At the request of several people at the DOT, the detailed CAFE calculations report was changed to include several engine parameters. The following parameters are now included; cubic inch displacement, number of cylinders, combustion cycle, turbo-charged, super-charged, valves per cylinder, transmission, drive system, and fuel(s) used. A legend is now also included at the end of the calculations section. The requested parameters are included at the Subconfiguration, Configuration, Base Level, and Model Type levels of calculations (baseline and final calculations).

This version of the detailed calculations output file is labelled as Version 1.23. The actual calculations were not changed in any way.  
The remainder of the included file is identical to the file previously sent.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov

website: <http://www.epa.gov/nvfel/>

From: EPA-Cafe  
To: [eeo@vw.com](mailto:eeo@vw.com), Jim Snyder/AA/USEPA/US@EPA  
Cc: [john.finneran@nhtsa.dot.gov](mailto:john.finneran@nhtsa.dot.gov), David Good/AA/USEPA/US@EPA, Jeff Alson/AA/USEPA/US@EPA, [alan.berkowitz@nhtsa.dot.gov](mailto:alan.berkowitz@nhtsa.dot.gov), Ben Ellies/AA/USEPA/US@EPA, [Harry.Thompson@dot.gov](mailto:Harry.Thompson@dot.gov), [terry.anderson@dot.gov](mailto:terry.anderson@dot.gov), Robert Peavyhouse/AA/USEPA/US@EPA, [christoph.kohnen@vw.com](mailto:christoph.kohnen@vw.com), [richard.thomas@vw.com](mailto:richard.thomas@vw.com)  
Date: 10/05/2009 11:37 AM  
Subject: EPA CAFE letter & calculation attached - 2008 Volkswagen LT

This e-mail message forwards a signed EPA letter and Corporate Average Fuel Economy (CAFE) calculation to your office.

CONFIDENTIALITY: The cover letter and the summary information on the "CAFE report" page are not confidential. However, the information included in the calculation section of the attached PDF file contain sales information in more detail than is normally available to competitors and to the general public. Release of the calculation section of this PDF file is not authorized.

This e-mail and the Adobe Acrobat (.pdf) attachment are an official Agency action. If there is a problem with the attachment or if you are not the intended recipient, please contact your certification team representative immediately. Adobe Acrobat Reader version 5.0 or later is required to open the attached PDF document(s).

[attachment "2008 VW Final LDT Reformed CAFE STD calc-received 3-10-09.xls" deleted by Robert Peavyhouse/AA/USEPA/US] [attachment "2008-0590-LT-CAFE.pdf" deleted by Robert Peavyhouse/AA/USEPA/US]

**To:** christoph.kohnen@vw.com;richard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; ichard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** richard.thomas@vw.com;john.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; ohn.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; lan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; erry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/29/2009 2:45:02 PM  
**Subject:** Re: EPA CAFE letter & calculation attached - 2008 Volkswagen IP (V1.23)  
[2008-0590-IP-CAFE-V123.pdf](#)

At the request of several people at the DOT, the detailed CAFE calculations report was changed to include several engine parameters. The following parameters are now included; cubic inch displacement, number of cylinders, combustion cycle, turbo-charged, super-charged, valves per cylinder, transmission, drive system, and fuel(s) used. A legend is now also included at the end of the calculations section. The requested parameters are included at the Subconfiguration, Configuration, Base Level, and Model Type levels of calculations (baseline and final calculations).

This version of the detailed calculations output file is labelled as Version 1.23. The actual calculations were not changed in any way.  
The remainder of the included file is identical to the file previously sent.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: EPA-Cafe

To: christoph.kohnen@vw.com, richard.thomas@vw.com, Jim Snyder/AA/USEPA/US@EPA  
Cc: richard.thomas@vw.com, john.finneran@nhtsa.dot.gov, David Good/AA/USEPA/US@EPA, Jeff  
Alson/AA/USEPA/US@EPA, alan.berkowitz@nhtsa.dot.gov, Ben Ellies/AA/USEPA/US@EPA,  
Harry.Thompson@dot.gov, terry.anderson@dot.gov, Robert Peavyhouse/AA/USEPA/US@EPA  
Date: 10/05/2009 03:16 PM  
Subject: EPA CAFE letter & calculation attached - 2008 Volkswagen IP

This e-mail message forwards a signed EPA letter and Corporate Average Fuel Economy (CAFE) calculation to your office.

CONFIDENTIALITY: The cover letter and the summary information on the "CAFE report" page are not confidential. However, the information included in the calculation section of the attached PDF file contain sales information in more detail than is normally available to competitors and to the general public. Release of the calculation section of this PDF file is not authorized.

This e-mail and the Adobe Acrobat (.pdf) attachment are an official Agency action. If there is a problem with the attachment or if you are not the intended recipient, please contact your certification team representative immediately. Adobe Acrobat Reader version 5.0 or later is required to open the attached PDF document(s).

[attachment "2008-0590-IP-CAFE.pdf" deleted by Robert Peavyhouse/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 12/15/2009 6:03:02 PM  
**Subject:** VW Group: Request for an Extension for Submission of the MY 2009 Volkswagen Group Common Sections.  
[CBI\\_9VWX\\_COMMON\\_RFA\\_APP\\_R00.PDF](#)

Hello Jim,

The attached letter was also submitted through the VERIFY System.

We are requesting a time extension for submission of the final update of the MY 2009 Volkswagen Group Common Sections. (See attachment.)

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

Leonard W. Kata Name  
Manager – Emis. Cert. Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
leonard.kata@vw.com E-Mail

December 15, 2009 Date

Subject: Request for an Extension for Submission of the MY 2009 Volkswagen Group  
Common Sections.

Dear Mr. Snyder,

We are requesting an extension of up to 90 days, as allowed by regulation, for the submission of the Volkswagen Group model year 2009 Common Sections. This request is necessary to allow us to add the final sales figures for the 2009 model year. All other model year 2009 applications will be submitted by the December 31, 2009 deadline. We will submit the 2009 Common Sections with as short of a delay as possible.

If you have any questions with regard to this request, please contact our office in Auburn Hills at (248) 754-4215 or (248) 754-4224.

Sincerely,



Leonard W. Kata  
Volkswagen Group of America, Inc.

Engineering and Environmental Office

Enclosure(s)

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Thomas, Richard" [Richard.Thomas@vw.com]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/4/2010 8:33:31 PM  
**Subject:** Re: Fw: 2010 pollution scores  
[pollution score chart summarychart.pdf](#)

I found the attached chart that listed .

<http://www.epa.gov/greenvehicles/Aboutratings.do#aboutairpollution>

<http://www.epa.gov/greenvehicles/summarychart.pdf>

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)



Vehicle Emission Standards and Air Pollution Score							
US EPA Federal Tier 2 Emission Standard Bins and California and Northeast States LEV II Emission Standards							Air Pollution Score
Standard	Vehicles	Emission Limits at Full Useful Life (100,000-120,000 miles)					
		Maximum Allowed Grams per Mile					
		NOx	NMOG	CO	PM	HCHO	
Bin 1	LDV, LLDT, HLDT, MDPV	0.00	0.000	0.0	0.0	0.0	10
ZEV	LDV, LDET	0.00	0.000	0.0	0.0	0.0	
PZEV	LDV, LDT	0.02	0.010	1.0	0.01	0.004	9.5
SULEV II	LDV, LDT	0.02	0.010	1.0	0.01	0.004	9
Bin 2	LDV, LLDT, HLDT, MDPV	0.02	0.010	2.1	0.01	0.004	8
Bin 3	LDV, LLDT, HLDT, MDPV	0.03	0.055	2.1	0.01	0.011	
ULEV II	LDV, LDT	0.07	0.055	2.1	0.01	0.011	7
Bin 4	LDV, LLDT, HLDT, MDPV	0.04	0.070	2.1	0.01	0.011	6
Bin 5	LDV, LLDT, HLDT, MDPV	0.07	0.090	4.2	0.01	0.018	
LEV II	LDV, LDT	0.07	0.090	4.2	0.01	0.018	
Bin 6	LDV, LLDT, HLDT, MDPV	0.10	0.090	4.2	0.01	0.018	5
LEV II option 1	LDV, LDT	0.10	0.090	4.2	0.01	0.018	4
SULEV II	MDV4	0.10	0.100	3.2	0.06	0.008	
Bin 7	LDV, LLDT, HLDT, MDPV	0.15	0.090	4.2	0.02	0.018	3
SULEV II	MDV5	0.20	0.117	3.7	0.06		
Bin 8a	LDV, LLDT, HLDT, MDPV	0.20	0.125	4.2	0.02	0.018	
ULEV II	MDV4	0.20	0.143	6.4	0.06	0.016	2
Bin 8b	HLDT, MDPV	0.20	0.156	4.2	0.02	0.018	
LEV II	MDV4	0.20	0.195	6.4	0.12	0.032	
Bin 9a	LDV, LLDT	0.30	0.090	4.2	0.06	0.018	1
Bin 9b	LDT2	0.30	0.130	4.2	0.06	0.018	
Bin 9c	HLDT, MDPV	0.30	0.180	4.2	0.06	0.018	
ULEV II	MDV5	0.40	0.167	7.3	0.06		0
Bin 10a	LDV, LLDT	0.60	0.156	4.2	0.08	0.018	
LEV II	MDV5	0.40	0.230	7.3	0.12		0
Bin 11	MDPV	0.90	0.280	7.3	0.12	0.032	

See Glossary in Summary of Current and Historical Emission Standards for explanation of terms.

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Thomas, Richard" [Richard.Thomas@vw.com]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/4/2010 8:38:19 PM  
**Subject:** Re: Fw: 2010 Verify VW Labels  
2010\_Verify\_VW\_Labels.xls

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US  
To: "Thomas, Richard" <Richard.Thomas@vw.com>  
Date: 01/04/2010 03:23 PM  
Subject: Fw: 2010 Verify VW Labels

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 01/04/2010 03:22 PM -----

From: Robert Peavyhouse/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 01/04/2010 02:47 PM  
Subject: 2010 Verify VW Labels

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**Cc:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=David Good/OU=AA/O=USEPA/C=US@EPA[]; N=David Good/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 2/6/2013 10:22:11 PM  
**Subject:** Re: VW/EPA Certification Meeting October 29, 2012

I'll look it over.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA  
Date: 02/06/2013 12:00 AM  
Subject: VW/EPA Certification Meeting October 29, 2012

Hello Jim, Dave, and Chris:

I know that some time has passed since we met in October 2012, but I would appreciate it if you would take a look at the meeting report and provide any comments or feedback. Other EPA staff participated as well and may wish to contribute their comments.

I have attached all of the slides from our meeting, for ready reference. The report is the last attachment. Please let me know if this should go into VERIFY.

Since the report indicates some follow-up on the part of VW and EPA, we would appreciate an opportunity to have a telephone conference/webinar to discuss the open points.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com  
[attachment "00\_Agenda\_EPA\_Cert-Test.pptx" deleted by Jim Snyder/AA/USEPA/US] [attachment "01\_Start\_Stop\_Survey.pptx" deleted by Jim Snyder/AA/USEPA/US] [attachment "02\_FFV.pptx" deleted

by Jim Snyder/AA/USEPA/US] [attachment "03\_AWC.pptx" deleted by Jim Snyder/AA/USEPA/US] [attachment "04\_BEV\_EPA.pptx" deleted by Jim Snyder/AA/USEPA/US] [attachment "05\_BEVx\_2012\_EPA.ppt" deleted by Jim Snyder/AA/USEPA/US] [attachment "06\_SAE\_1634\_EPA.pptx" deleted by Jim Snyder/AA/USEPA/US] [attachment "07\_PHEV.pptx" deleted by Jim Snyder/AA/USEPA/US] [attachment "08\_Energy\_assist\_EPA.pptx" deleted by Jim Snyder/AA/USEPA/US] [attachment "VW EPA Cert Meeting Oct 29,2012.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Kohnen, Christoph (VWGoA)"  
[christoph.kohnen@vw.com]; Kohnen, Christoph (VWGoA)"  
[christoph.kohnen@vw.com]  
**From:** "Kata, Leonard"  
**Sent:** Thur 2/16/2012 11:09:20 PM  
**Subject:** RE: SUBJECT: Evaporative durability aging fuel for gasoline vehicles

Hello Dave:

Dr. Kohnen asked me to look into your questions regarding evaporative emission durability aging for gasoline engines. I have contacted the factories. The response that I received is provided on behalf of the entire Volkswagen Group. I have repeated your questions for clarity.

1. Please describe what type of evaporative durability program(s) you are using for 2013 evaporative families, e.g. whole vehicle, bench aging, or both. If both, please provide the approximate percentage of each.

Response: The Volkswagen Group uses both, bench aging and whole vehicle durability procedure. 40 percent of the ORVR families are using whole-vehicle aging plus bench-aging and 60 percent have been bench-aged only.

2. Please describe your plans to phase in the use of E15 (or higher) for evaporative durability programs. If possible, please provide the ethanol content you intend to use for 2013, 2014 and 2015 model year evaporative durability programs.

Response: For model year 2013, Volkswagen will continue using a combination of bench-aging only and whole vehicle durability procedures plus bench testing. Volkswagen, as a group, is using commercial fuel for the aging procedures, which contains E10. Certification test fuels for the SHED and refueling test are according the current fuel specification regulations (E0). Volkswagen will carry-over 23 evaporative emission/ORVR families to model year 2013 and certify two new evaporative emission/ORVR families for model year 2013. New evaporative emission/ORVR families to be certified in 2014 and subsequent model years will continue to use commercial fuel according to the field specification in effect (e.g., E15). For the carry-over families in model year 2013 and for later model years, Volkswagen conducted an engineering evaluation to determine the effect on aging if an ethanol content higher than E10 is used for the aging procedures, to cover ethanol content up to E15 in the market. The engineering results show that ethanol has no impact on the gradient of aging over time and therefore has no impact on the deterioration factors.

Please let me know if you have any further questions.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

-----Original Message-----

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Monday, February 06, 2012 12:59 PM  
To: Kohnen, Christoph (VWGoA)  
Cc: Jim Snyder; Kata, Leonard  
Subject: Re: SUBJECT: Evaporative durability aging fuel for gasoline vehicles

Christoph,

Please let me know how you are coming on my Evap durability questions.  
If, possible, I could use your answers in the next two weeks.

Thanks

Dave

---

From: David Good/AA/USEPA/US  
To: christoph.kohnen@vw.com  
Cc: leonard.kata@vw.com, Jim Snyder/AA/USEPA/US@EPA  
Date: 12/16/2011 05:14 PM  
Subject: SUBJECT: Evaporative durability aging fuel for gasoline vehicles

Dr. Kohnen,

Background: As you know, for evaporative durability programs, the provisions of 40 CFR 86.1824-08, require that the service accumulation fuel "contains ethanol in, at least, the highest concentration permissible in gasoline under federal law and that is commercially available in any state in the United States. Unless otherwise approved by the Administrator, the manufacturer must determine the appropriate ethanol concentration by selecting the highest legal concentration commercially available during the calendar year before the one in which the manufacturer begins its mileage accumulation." This requirement applies mostly to whole vehicle evaporative durability programs. For evaporative bench aging programs, aging procedures are required to be "designed using good engineering judgment, to evaluate the emission deterioration of evaporative control systems" including any deterioration caused by the effects of in-use fuels (including ethanol content) on the evaporative system; ref. 40 CFR 86.1824-08(d) and (e).

Status of E15 in-use fuel: As of November 15, 2011, E15 has been approved by EPA, but has not yet been registered with EPA (and therefore was not yet legal for distribution or for sale as a transportation fuel at that time). See <http://www.epa.gov/otaq/regs/fuels/additive/e15/>.

Manufacturer's evaporative durability programs: I'm thinking that most manufacturers will be proactive regarding the ethanol content of their evaporative service accumulation/bench aging fuel. For example, I'm thinking that some manufacturers may have already begun using E15 (or higher) evaporative durability fuel or will soon begin using it, especially for new evaporative families which are expected to be carried over for several years. [Note: I'm referring to the evaporative service accumulation/bench aging fuel only, not the evaporative test fuel.]

Questions: When you get a chance, please email us the following information:

1. Please describe what type of evaporative durability program(s) you are using for 2013 evaporative families, e.g. whole vehicle, bench aging, or both. If both, please provide the approximate percentage of each.
2. Please describe your plans to phase in the use of E15 (or higher) for evaporative durability programs. If possible, please provide the ethanol content you intend to use for 2013, 2014 and 2015 model year evaporative durability programs.

For example, your response could indicate that "For the 2013 model year we will use bench aging evaporative durability programs, only. For the 2013 model year, we expect to have 5 evaporative/refueling families, of which 4 are carryover and will simulate the evaporative durability effects of E10 and one will simulate the evaporative durability effects of E15" with similar statements for 2014 and 2015 model year.

Thanks

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 3/1/2012 1:33:46 PM  
**Subject:** RE: 2011 LT CAFE Processing (Submission 253)

Hi Bob;

Thanks for the instructions, but I need a couple things clarified. We made the first section changes logged on as Audi now, so step one and two are completed. Now as I log on as Volkswagen and you said to re-submit with division code=1, am I to assume that this will be a new label entry, which means I have to create a new label index number, correct? I cannot delete index 40, 41 and 42 as an Audi index so is that something that you can tag later on when your CAFE audit program finds a label that is not used?

We are have a great deal of difficulty when it comes to manufacture code and division numbers. When I enter a label and go back to it later in time, I have no indication of how I logged, Volkswagen or Audi. Can we have a discussion regards this issue?

Is it possible to create a Volkswagen Group manufacturer code with division codes for the brands Volkswagen, Audi, Bentley, Lamborghini and Bugatti? If something were to be created like that, how much can be accomplished by Verify and how much work would it be for us? Presently, it is twice as much work to make all this work with the granting of permissions and such. Additionally, the Verify help line instructed me to enter footprint information for all car lines for the CAFE as Volkswagen (VWX). I think that the next problem will be agreeing with the reformed CAFE standard that EPA calculates versus our calculation.

Thanks,  
Richard 248 754-4213



**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=David Good/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard"  
[Leonard.Kata@vw.com]; Kata, Leonard" [Leonard.Kata@vw.com]; Harris, Dale"  
[Dale.Harris@vw.com]  
**Bcc:** []  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 3/1/2012 2:21:57 PM  
**Subject:** 2011 Volkswagen Group NOx Fleet Average Credits  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

[attachment "CBI\_BVWX\_COMMON\_CR1\_ABT\_R00.pdf" deleted by David Good/AA/USEPA/US]  
[attachment "CBI\_BVWX\_COMMON\_CR1\_ABT\_R00.xlsx" deleted by David Good/AA/USEPA/US]  
Hello Jim;

Please find attached, the cover letter with spreadsheet printouts of the EPA NOx fleet average template as well as the Excel spreadsheet file. As it was stated in the letter the spreadsheet does not include the HLDLT volumes, but it is of little consequence because all models are certified to the 0.07 g/mi NOx standard or better. None of the HLDLT are certified better than 0.07 NOx. The total number of 2011 Volkswagen Group LDV/LLDT and HLDLT is 333,336 units. If you see anything that needs to be corrected please let me know. I will attempt to place the pdf file into Verify, if you can tell me where it goes.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**From:** "Harris, Dale"  
**Sent:** Fri 3/2/2012 6:29:15 PM  
**Subject:** GHG Early Credit Report - Question (VWGoA)  
[Early Credit Report.xlsx](#)  
[@vw.com](#)  
<http://www.volkswagengroupamerica.com/>

Dave

Hello!!

I am Dale Harris Certification Specialist reporting to Len Kata at VWGoA. I am preparing the GHG Early Credit Report for submission and need clarity/direction on a couple of issues.

1. I am using the 'Banking & Trading Summary Table' provided via the EPA GHG site for the Early Credit Report. Is this the appropriate template??
2. I have modified the template to include multiple car and truck rows to enable pathway 3 calculations to appear appropriately. Is it ok to modify the template??

In addition I have attached a draft version of the report that will enable you to provide responses to the questions above. Thanks!!!

Regards,

Dale Harris

Certification Specialist

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Engineering and Environmental Office (EEO)  
3800 Hamlin

AuburnHills Michigan 48326

United States of America

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<http://www.volkswagengroupamerica.com/>

Confidentiality Notice: This message (including any attachments) is intended exclusively for the individual or entity to which it is addressed. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**From:** "Harris, Dale"  
**Sent:** Thur 3/8/2012 3:22:23 PM  
**Subject:** RE: GHG Early Credit Report - Question (VWGoA)  
[@vw.com](mailto:leonard.kata@vw.com)  
<http://www.volkswagengroupamerica.com/>  
[@vw.com](mailto:leonard.kata@vw.com)  
<http://www.volkswagengroupamerica.com/>

Dave

This is a follow up note. Still looking feedback on the questions identified below. Thanks!!

Regards,

Dale Harris

Certification Specialist

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office (EEO)  
3800 Hamlin

AuburnHills Michigan 48326

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E: Dale.Harris@vw.com

<http://www.volkswagengroupamerica.com/>

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From: Harris, Dale  
Sent: Friday, March 02, 2012 1:29 PM  
To: Dave Good  
Cc: Kata, Leonard  
Subject: GHG Early Credit Report - Question (VWGoA)

Dave

Hello!!

I am Dale Harris Certification Specialist reporting to Len Kata at VWGoA. I am preparing the GHG Early Credit Report for submission and need clarity/direction on a couple of issues.

1. I am using the 'Banking & Trading Summary Table' provided via the EPA GHG site for the Early Credit Report. Is this the appropriate template??
2. I have modified the template to include multiple car and truck rows to enable pathway 3 calculations to appear appropriately. Is it ok to modify the template??

In addition I have attached a draft version of the report that will enable you to provide responses to the questions above. Thanks!!!

Regards,

Dale Harris

Certification Specialist

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office (EEO)  
3800 Hamlin

AuburnHills Michigan 48326

United States of America

P: +1 248 754-4218

E: Dale.Harris@vw.com

<http://www.volkswagengroupamerica.com/>

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**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**From:** "Harris, Dale"  
**Sent:** Fri 3/9/2012 1:00:26 PM  
**Subject:** RE: GHG Early Credit Report - Question (VWGoA)

Dave

Thanks for the feedback!!!! Truly appreciated.

Regards,  
Dale Harris  
Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office (EEO)  
3800 Hamlin  
Auburn Hills Michigan 48326  
United States of America

P: +1 248 754-4218  
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-----Original Message-----

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Thursday, March 08, 2012 6:18 PM  
To: Harris, Dale  
Cc: Kata, Leonard; Roberts French; Tom Anderson  
Subject: Re: GHG Early Credit Report - Question (VWGoA)

Dale,

Thanks for the reminder---sorry it took me so long to reply.

1. Yes It's OK to modify the templates if you need to. Please keep track of the modifications and document them somewhere in your early credit report. For example, the report could indicate that VW used the EPA template "Averaging, Banking and Trading Summary Table" provided at <http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>, except we modified it as follows: XXX; YYY; and ZZZ. Note that we didn't anticipate that manufacturers would use the "Pre-Model Year Report Projected CREE Compliance Level" template for early credit reports because it is based on model type data instead of subconfiguration data (like CAFE calculations).

2. Your modifications look OK to me---to track Federal and Calif/177 State compliance separately for Pathway 3 early credits. However, as you know VW can only use one pathway for early credits---so I'd recommend that you revise your description in the Comments column from "Credits Pathways 2 & 4" to "Pathway 3 Federal production" and "Pathway 3 Calif/177 State Production" (or something to that

effect).

Regards

From: "Harris, Dale" <Dale.Harris@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Cc: "Kata, Leonard" <Leonard.Kata@vw.com>  
Date: 03/02/2012 01:29 PM  
Subject: GHG Early Credit Report - Question (VWGoA)

Dave

Hello!!

I am Dale Harris Certification Specialist reporting to Len Kata at VWGoA. I am preparing the GHG Early Credit Report for submission and need clarity/direction on a couple of issues.

1. I am using the 'Banking & Trading Summary Table' provided via the EPA GHG site for the Early Credit Report. Is this the appropriate template??
2. I have modified the template to include multiple car and truck rows to enable pathway 3 calculations to appear appropriately. Is it ok to modify the template??

In addition I have attached a draft version of the report that will enable you to provide responses to the questions above. Thanks!!!

Regards,  
Dale Harris  
Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office (EEO)

3800 Hamlin  
AuburnHills Michigan 48326  
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P: +1 248 754-4218  
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(See attached file: Early Credit Report.xlsx)



**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;"Thomas, Richard (EEO)"  
[Richard.Thomas@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; im  
Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 3/12/2012 3:44:05 PM  
**Subject:** Transmission Lock-Up Definitions in Verify  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Hello Bob,

I had a discussion with Dave Good regarding automated manual transmissions and double clutch automatic transmissions.

I believe we finally have the lock-up definition that has been plaguing Richard Thomas with the CAFE and GHG submissions nearly corrected in our system.

To recap:

Automated manual and double clutch (DSG) transmissions with a manual shift mode (by paddles or shift lever) will come under the new designation: "AMS" with Verify Release 10.

Lock-up refers to "transmission lock-up", not torque converter lock-up, for these transmissions and the answer is: "Y" (yes).

For MY 2012 and prior model years we will leave the DSG transmissions designated as Semi-Automatic (SA) and set the lock-up to "Y".

For our automated manual (AM) transmissions, the transmission lock-up is currently set to "N" (no). Should it be set to "Y"?

Currently, transmission lock-up for our CVT transmissions is set to "N".

Based on my understanding of the definition of "transmission lock-up", the answer for our CVT transmissions (no torque converter used) should be "Y". Is this true?

Let me know if the above is correct.

We will correct whatever is necessary based on your response.

I think, with these answers, this will finally end the confusion with this issue for us.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/13/2012 1:48:15 PM  
**Subject:** Re: Transmission Lock-Up Definitions in Verify  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Bob,

From my standpoint (processing labels and CAFE), it doesn't really matter unless you have multiple models and the only difference is that one of them has lockup=yes, and the other lockup=no. The only thing that matters to the processing of the data is that you are consistent throughout the certification and labeling process.

However, Dave Good deals more with the fuel economy guide, and he does have a preferred way to keep things consistent between manufacturers. So I will defer to Dave to give you guidance on this issue.

The biggest problem I see is when a manufacturer lists a certified model in their test group one way, and then changes it when labeling. CAFE uses all of the data already entered in Label, so it really isn't a problem for CAFE other than this is where the inconsistency is currently flagged. We have a business rule in the works to keep this from happening in future labels, but it won't be in place until May 11th.

But as I mentioned, it doesn't matter to the processing as long as you are consistent.

Robert Peavyhouse  
Compliance Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4053  
email: [peavyhouse.robert@epa.gov](mailto:peavyhouse.robert@epa.gov)  
website: <http://www.epa.gov/nvfel/>

**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Robert Peavyhouse/AA/USEPA/US@EPA  
**Cc:** David Good/AA/USEPA/US@EPA, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
**Date:** 03/12/2012 11:44 AM  
**Subject:** Transmission Lock-Up Definitions in Verify

Hello Bob,

I had a discussion with Dave Good regarding automated manual transmissions and double clutch automatic transmissions.

I believe we finally have the lock-up definition that has been plaguing Richard Thomas with the CAFE and GHG submissions nearly corrected in our system.

To recap:

Automated manual and double clutch (DSG) transmissions with a manual shift mode (by paddles or shift lever) will come under the new designation: "AMS" with Verify Release 10.

Lock-up refers to "transmission lock-up", not torque converter lock-up, for these transmissions and the answer is: "Y" (yes).

For MY 2012 and prior model years we will leave the DSG transmissions designated as Semi-Automatic (SA) and set the lock-up to "Y".

For our automated manual (AM) transmissions, the transmission lock-up is currently set to "N" (no). Should it be set to "Y"?

Currently, transmission lock-up for our CVT transmissions is set to "N".

Based on my understanding of the definition of "transmission lock-up", the answer for our CVT transmissions (no torque converter used) should be "Y". Is this true?

Let me know if the above is correct.

We will correct whatever is necessary based on your response.

I think, with these answers, this will finally end the confusion with this issue for us.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; "Verify Help Desk (verifyhelp@csc.com)" [verifyhelp@csc.com]; im Snyder/AA/USEPA/US@EPA; "Verify Help Desk (verifyhelp@csc.com)" [verifyhelp@csc.com]; Verify Help Desk (verifyhelp@csc.com)" [verifyhelp@csc.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 3/29/2012 1:26:38 PM  
**Subject:** 2013 VWGoA PC Final CAFE and Verify  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

Hi Bob;

Verify has finally accepted the 2011 VWGoA Import Passenger Car CAFE. For your information, we had to create the 2011 Lamborghini Gallardo model indexes, 52, 53, and 54 as new under the Audi sign on, and they are now Audi labels 152, 153 and 154.

The Audi label 58 for the Volkswagen Eos was created under Volkswagen, and is now label index 158.

I will look forward to your audit of the PC CAFE.

Beginning with model year 2013, I will create all Volkswagen Group brand fuel economy labels under Volkswagen. The only exception is the Bentley GT and GTC equipped with the Audi certified 4.0L V8 engine for which I had already labeled for 2013. We are hoping this will eliminate some of these permission trials we have to establish when it comes time for the CAFE and GHG reporting.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)



**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=David  
Good/OU=AA/O=USEPA/C=US@EPA;CN=DavidA  
Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=David  
Good/OU=AA/O=USEPA/C=US@EPA;CN=DavidA  
Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=DavidA  
Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=Joel  
Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=Joel  
Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=Martin  
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Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; N=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=William  
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Ott/OU=AA/O=USEPA/C=US@EPA;William.Rodgers@vw.com[]; illiam.Rodgers@vw.com[]  
**Cc:** Leonard.Kata@vw.com;michael.giles@vw.com[]; ichael.giles@vw.com[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 4/4/2012 2:25:28 PM  
**Subject:** VW Group - Audi A8 w/Start/Stop and Cyl Deactivation Test Drive  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

I reserved a room in case we want an pre-drive intro but primary a test drive opportunity of the Audi S/S system .

---

Hello Jim,

We would like to schedule time at your facility on Tuesday afternoon May 8th to allow you and EPA staff to test drive a 2013 Audi A8 4.0L V8 equipped with Start-Stop and Cylinder Deactivation technologies. We plan to have Audi Engineers available during the time of the test drives to answer any questions that you or other staff may have. Please let us know if this date is acceptable and what block of time will work best for you. As you know, Audi representatives will already be at EPA for confirmatory testing the morning of May 8 and 9th so either afternoon is acceptable for us. An alternative might be Monday May 7th after we deliver the test vehicle but the fore mentioned dates are preferred.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 3/7/2012 6:33:13 PM  
**Subject:** 2011 FE Guide data in Verify attached  
[VW Group 2011 FE Guide-all rel dates-no-sales-3-7-2012.xlsx](#)

Richard,

Here you go. I didn't bother to double check for errors and double check the errors that the macro found.

Let me know if you need any other model years.

Also as a heads up---the May 11, 2012 Verify release (Release 10) will have a new transmission type "AMS" for Selectable Automated Manual (e.g. Automated Manual with paddles). Verify will then determine the Transmission as listed in the FE Guide from the number of forward gears. For example, an AMS trans with 6 forward gears will be listed as "Auto (AM-S6)."

You may want to start using it for your 2013 model year vehicles.

Regards

**To:** Robert.Hart@vw.com[]  
**Cc:** CN=Sandra Somoza/OU=AA/O=USEPA/C=US@EPA;CN=Christi Poirier/OU=AA/O=USEPA/C=US@EPA;CN=Karen Danzeisen/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;richard.thomas@vw.com[]; N=Christi Poirier/OU=AA/O=USEPA/C=US@EPA;CN=Karen Danzeisen/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;richard.thomas@vw.com[]; N=Karen Danzeisen/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;richard.thomas@vw.com[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;richard.thomas@vw.com[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;richard.thomas@vw.com[]; ichard.thomas@vw.com[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/8/2012 9:35:20 PM  
**Subject:** VW Group: Transmission Lockup Choices in Verify  
[robert.hart@vw.com](mailto:robert.hart@vw.com)  
(embedded image)  
(embedded image)  
(embedded image)

Bob H,

Bob, Peavyhouse says that the transmission lockup data entry for Test Group, VI,, FE Label and CAFE transmission fields must be consistent. We are not aware of any business rules which require a "yes" or "no" in the Transmission lockup fields for a certain type of transmission,.

Also, as we discussed today, the EPA Verify "automated manual" transmission type is meant to include the VW dual-clutch transmission and the VW type of automated manual transmission which doesn't have dual clutches. As a "heads up," the May 11, 2012 Verify release (Release 10) we will have a new transmission type "AMS" for Selectable Automated Manual transmissions (e.g. Automated Manual with paddles or with a tiptronic gear selector). Verify will then determine the "Transmission as listed in the FE Guide" field from the transmission type (AMS) and the number of forward gears. For example, an AMS trans with 6 forward gears will be listed in the FE Guide as "Auto (AM-S6)."

For automated manual transmissions, I'd recommend that after May 11, 2012, VW begin using this new field for 2013 model year vehicles and enter "yes" for transmission lock-up for those transmissions. The transmission lock-up field was not meant to mean lockup torque converter (as may have been the case in some of the old CFEIS instructions). See Bob Peavyhouse's attached email. Verify data elements field VI-38 is correct---the description for that field doesn't mention the torque converter. Verify data elements fields GL-69 and TG-309 need to be corrected---the description for those fields mentions a locking torque converter.

The good news is that the Verify front-end data input headings are correct---they don't mention "torque converter." See Bob P's email, below.

Dave

----- Forwarded by David Good/AA/USEPA/US on 03/08/2012 04:09 PM -----

From: Robert Peavyhouse/AA/USEPA/US  
To: David Good/AA/USEPA/US@EPA  
Date: 03/08/2012 01:27 PM  
Subject: Transmission Lockup (does NOT say Torque Converter)

Dave,  
Our front-end screens do not say "Torque Converter" Lockup, they all say "Transmission Lockup".  
All dual clutch transmissions would be Transmission Lockup = Yes.  
This is in the Test Group Dataset under Certified Models

This is in Vehicle Information Dataset

This is in the Label Dataset

Robert Peavyhouse  
Compliance Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4053  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfe/>

From: Stephen Healy/AA/USEPA/US  
To: Sandra Somoza/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA  
Cc: Christi Poirier/AA/USEPA/US@EPA, Karen Danzeisen/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA  
Date: 03/08/2012 12:51 PM  
Subject: Re: Fw: VW Group: Transmission Choices in Verify

This has an impact on the Fuel Economy Guide, so I would recommend Dave Good respond.  
Steve

From: Sandra Somoza/AA/USEPA/US  
To: Stephen Healy/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA, Karen Danzeisen/AA/USEPA/US@EPA, Christi Poirier/AA/USEPA/US@EPA  
Date: 03/08/2012 11:06 AM  
Subject: Fw: VW Group: Transmission Choices in Verify

Steve,

Can you look into this and let me know how we should proceed? Thanks

Sandra Somoza  
U.S. Environmental Protection Agency  
Office of Transportation and Air Quality  
Compliance Division  
734 214-4704  
somoza.sandra@epa.gov

----- Forwarded by Sandra Somoza/AA/USEPA/US on 03/08/2012 11:05 AM -----

From: Sandra Somoza/AA/USEPA/US  
To: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, verifyhelp@csc.com  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 03/08/2012 11:05 AM  
Subject: Re: VW Group: Transmission Choices in Verify

I am forwarding your request to the help desk.

Sandra Somoza  
U.S. Environmental Protection Agency  
Office of Transportation and Air Quality  
Compliance Division  
734 214-4704  
somoza.sandra@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Sandra Somoza/AA/USEPA/US@EPA  
Cc: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Giles, Michael" <michael.giles@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 03/08/2012 10:57 AM  
Subject: VW Group: Transmission Choices in Verify

Hello Sandra,

The Volkswagen Group uses a variety of automatic transmission types. Most are covered by the available selections in the Verify System.  
One type is not. We have a "double clutch" automatic transmission that uses two clutches instead of a torque converter.

Because our vehicles have a driver selectable "Tiptronic" (manual shift) mode in addition to the fully automatic mode, we use the semi-automatic designation in Verify for these transmissions.  
This transmission, not having a torque converter, does not use lock-up because much like a manual transmission, it is locked up all of the time.  
This transmission does not fit into the automated manual transmission designation. We have automated manual transmissions and they are a considerably different configuration.

Historically, we have been entering these “double clutch” transmissions as semi-automatic with no lock-up because there is no torque converter to lock up. Since the more recent business rules have been in place, when a transmission is designated as an automatic or semi-automatic, Verify requires the torque converter lock-up option to be set to yes. With the current business rules in Verify, we now have to go back and reset the torque converter lock-up option to yes for all of these transmissions, even though they do not have it. We were instructed to do that by Bob Peavyhouse in order to pass all of the business rules for the CAFE / GHG submissions.

If possible, we would like to have a new lock-up option choice\* added in Verify of “not applicable” for these transmissions and the business rules changed to allow that choice for automatic and semi-automatic transmissions.

We are not the only manufacturer using double clutch transmissions. Please contact me if you need any more information. Any feedback you can give me will be greatly appreciated. If you reply to this e-mail, please reply to all.

\*Entries for Lock-Up can be found in the following locations:  
Vehicles, Fuel Properties and Tests - Vehicle and Test Information-Vehicle Information - Transmission Certification - Test Group - Evap Stnds/Tests/Models-Evaporative Family # - Certified Models  
Fuel Economy - General Information - Transmission Class Information

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
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Auburn Hills, MI 48326

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E-mail: robert.hart@vw.com

**To:** "Harris, Dale" [Dale.Harris@vw.com]  
**Cc:** "Kata, Leonard" [Leonard.Kata@vw.com]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[];  
N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/8/2012 11:18:03 PM  
**Subject:** Re: GHG Early Credit Report - Question (VWGoA)  
[Early Credit Report.xlsx](#)  
[@vw.com](#)  
<http://www.volkswagengroupamerica.com/>

Dale,

Thanks for the reminder---sorry it took me so long to reply.

1. Yes It's OK to modify the templates if you need to. Please keep track of the modifications and document them somewhere in your early credit report. For example, the report could indicate that VW used the EPA template "Averaging, Banking and Trading Summary Table" provided at <http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>, except we modified it as follows: XXX; YYYY; and ZZZZ. Note that we didn't anticipate that manufacturers would use the "Pre-Model Year Report Projected CREE Compliance Level" template for early credit reports because it is based on model type data instead of subconfiguration data (like CAFE calculations).

2. Your modifications look OK to me---to track Federal and Calif/177 State compliance separately for Pathway 3 early credits. However, as you know VW can only use one pathway for early credits---so I'd recommend that you revise your description in the Comments column from "Credits Pathways 2 & 4" to "Pathway 3 Federal production" and "Pathway 3 Calif/177 State Production" (or something to that effect).

Regards

From: "Harris, Dale" <Dale.Harris@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Cc: "Kata, Leonard" <Leonard.Kata@vw.com>  
Date: 03/02/2012 01:29 PM  
Subject: GHG Early Credit Report - Question (VWGoA)

Dave

Hello!!

I am Dale Harris Certification Specialist reporting to Len Kata at VWGoA. I am preparing the GHG Early Credit Report for submission and need clarity/direction on a couple of issues.

1. I am using the 'Banking & Trading Summary Table' provided via the EPA GHG site for the Early Credit Report. Is this the appropriate template??
2. I have modified the template to include multiple car and truck rows to enable pathway 3 calculations to appear appropriately. Is it ok to modify the template??

In addition I have attached a draft version of the report that will enable you to provide responses to the questions above. Thanks!!!

Regards,  
Dale Harris  
Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office (EEO)  
3800 Hamlin  
AuburnHills Michigan 48326  
United States of America

P: +1 248 754-4218  
E: Dale.Harris@vw.com  
<http://www.volkswagengroupamerica.com/>

Confidentiality Notice: This message (including any attachments) is intended exclusively for the individual or entity to which it is addressed. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.

**To:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/13/2012 4:38:27 PM  
**Subject:** Re: Transmission Lock-Up Definitions in Verify  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Bob H,

Regarding your question about what should be entered for the lock-up field for CVT transmissions, for about 60% of the CVT transmissions in Verify, manufacturers have entered No (and about 40 % they entered Yes). for 2011-2013 data in Verify.

Use your own judgment on what to enter in VW/Audi's case-----but as Bob P said, please be consistent from Test group info to FE Label to CAFE data entry.

Dave

From: Robert Peavyhouse/AA/USEPA/US  
To: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Cc: David Good/AA/USEPA/US@EPA, Jim Snyder/AA/USEPA/US@EPA, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
Date: 03/13/2012 09:48 AM  
Subject: Re: Transmission Lock-Up Definitions in Verify

Bob,

From my standpoint (processing labels and CAFE), it doesn't really matter unless you have multiple models and the only difference is that one of them has lockup=yes, and the other lockup=no. The only thing that matters to the processing of the data is that you are consistent throughout the certification and labeling process.

However, Dave Good deals more with the fuel economy guide, and he does have a preferred way to keep things consistent between manufacturers. So I will defer to Dave to give you guidance on this issue.

The biggest problem I see is when a manufacturer lists a certified model in their test group one way, and then changes it when labeling. CAFE uses all of the data already entered in Label, so it really isn't a problem for CAFE other than this is where the inconsistency is currently flagged. We have a business rule in the works to keep this from happening in future labels, but it won't be in place until May 11th.

But as I mentioned, it doesn't matter to the processing as long as you are consistent.

Robert Peavyhouse  
Compliance Division  
U.S. EPA - Office of Transportation and Air Quality



phone: (734) 214-4814  
fax: (734) 214-4053  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: David Good/AA/USEPA/US@EPA, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
Date: 03/12/2012 11:44 AM  
Subject: Transmission Lock-Up Definitions in Verify

Hello Bob,

I had a discussion with Dave Good regarding automated manual transmissions and double clutch automatic transmissions.  
I believe we finally have the lock-up definition that has been plaguing Richard Thomas with the CAFE and GHG submissions nearly corrected in our system.

To recap:

Automated manual and double clutch (DSG) transmissions with a manual shift mode (by paddles or shift lever) will come under the new designation: "AMS" with Verify Release 10.

Lock-up refers to "transmission lock-up", not torque converter lock-up, for these transmissions and the answer is: "Y" (yes).

For MY 2012 and prior model years we will leave the DSG transmissions designated as Semi-Automatic (SA) and set the lock-up to "Y".

For our automated manual (AM) transmissions, the transmission lock-up is currently set to "N" (no). Should it be set to "Y"?

Currently, transmission lock-up for our CVT transmissions is set to "N".

Based on my understanding of the definition of "transmission lock-up", the answer for our CVT transmissions (no torque converter used) should be "Y". Is this true?

Let me know if the above is correct.

We will correct whatever is necessary based on your response.

I think, with these answers, this will finally end the confusion with this issue for us.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/17/2012 8:19:42 PM  
**Subject:** 2013 data in Verify as of May 11,2012 5PM is attached  
[VW Group 2013 FEGuide1-all rel dates-no-sales-5-11-2012.xlsx](#)

Richard,

You are correct. According to the Data Elements, the mfr code field in the FE Label module (GL-2) is assigned by Verify---it is derived by Verify from the users' CDX account.

Attached is the VW/Audi data in Verify just prior to deploying Release 10.

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/31/2012 6:57:32 PM  
**Subject:** Re: Testing Strategy Approval Request - Audi A8 Start/Stop Systems  
[winmail.dat](#)

Richard,

Background: In a May 8, 2012 meeting, VW/Audi staff presented EPA with a description of the stop/start system and cylinder deactivation system for these 2013 Audi A8 vehicles. The vehicle is equipped with what you called "Last-mode functionality," where the last stop/start setting (enable/disable mode) is restored after stopping and restarting the vehicle. In other words, the stop/start button is "latched" when stopping and restarting the vehicle. Although I had a conflict on May 8, 2012 and didn't get to drive the vehicle, it's my understanding that the May 8, 2012 drive was acceptable to all EPA engineers who drove it (including both the stop/start feature and the cylinder deactivation feature of the vehicle).

Regarding your current request to perform one test for the Highway, SC03 and Cold FTP cycle (and two sets of FTP and US06 tests----with and without the stop/start system enabled), we believe that your request sounds reasonable to us, and it is hereby approved.

Please call or email me if you have questions about this email.

Regards

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: David Good/AA/USEPA/US@EPA, Jim Snyder/AA/USEPA/US@EPA  
Cc: Linc Wehrly/AA/USEPA/US@EPA, "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
Date: 05/21/2012 09:02 AM  
Subject: Testing Strategy Approval Request - Audi Start/Stop Systems

Hello Dave;

After our visit with the demonstration 4.0L V8 Audi A8 on May 8th and equipped with cylinder deactivation and start/stop strategy, we reviewed our testing strategy and have the following request.

The 3.0L V6 engine equipped Audi A8 emission data vehicle tested on May 2nd and May 8th at the EPA facility, was tested in two configurations. That is: complete five cycle tests with start/stop active and a complete second set of tests with start/stop system inactive at our facility in Ingolstadt . EPA confirmed the city tests in both configurations, start/stop active and inactive. Under the start/stop enable conditions you saw during the presentation, it is clear that the engine does not stop during three of the 5-cycle tests. There is no engine shut down in Highway, SC03 and Cold CO test cycles and only marginal engine stop in the US06 test cycle. The current start/stop strategy would yield on minor fuel economy improvement in the FTP and US06 cycle and therefore we would prefer to test only the FTP and US06 harmonically average the two sets of test configurations together at the 50/50 rate.

The high cost testing burden at our facility would be lessened and testing capacity could improve. Until which time there are some operational start/stop system strategy changes, we would propose to test only the FTP and US06 with start/stop active and inactive and average these tests at the 50/50 rate.

If you have any questions, please contact me directly.

Best regards,  
Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com<mailto:Richard.Thomas@VW.com>

**To:** oliver-schmidt@vw.com[]  
**Cc:** CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;dale.harris@vw.com[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;dale.harris@vw.com[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;dale.harris@vw.com[]; eonard.kata@vw.com;dale.harris@vw.com[]; ale.harris@vw.com[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/11/2012 4:58:12 PM  
**Subject:** 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors  
 VW-PreMY Rpt-CBI\_DVWXV\_COMMON\_CR1\_CAR\_R02[1]-from Verify-4-20-2012.zip  
<http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>

Oliver & Len,

I have some questions about Volkswagen's 2013 GHG Pre-Model year Report.

First of all, thanks for using the EPA templates. It makes it easy for me to review your Pre-MY report information.

1. Potential error in your fleet average calculations: Using the projected CREE fleet average estimates and CREE standards listed in your (attached) 2013 Pre-MY report spreadsheet, I come up with slightly different results for the total "Model Year Credits (Debits)" fields for car and trucks for 2012-2015 model years. For example, my calculations for 2013-2015 model year result in the following credit (Megagram) values:

Category	D.Good CREE Calcs	VW CREE values	Comments
2013 Pass Car	(730,335)	(778,903)	
2013 Light Truck 87,527		87,527	agrees with VW
2014 Pass Car	(79,674)	(91,543)	
2014 Light Truck (16,902)		(17,244)	
2015 Pass Car	(424,806)	(395,074)	
2015 Light Truck (272,380)		(275,812)	

My calculations, for example, for 2013 cars are  $[(258 - 269)(550,837)(195,264)/1,000,000] - 404,242$  (A/C credits) = 778,903 credits. It looks like your calculations are not rounding the CREE standards and fleet average CREE values to the nearest whole gram/mile, as required by EPA regulations.

Please advise.

**Ex. 4 - CBI**

Please advise.

3. Bugatti: Bugati models appear to be missing in your 2013-2015 templates.

Please advise

4. Three AB&T Spreadsheets: Your report contains three AB&T spreadsheets. None of them include projections for 2014 or 2015 model year credits. Please combine the three spreadsheets into one AB&T spreadsheet which includes a listing for 2014 and 2015 credits.

Please advise.

5. A/C Leakage and Efficiency Credits: Your 2013 Pre-MY report doesn't contain any details of how the A/C credits were generated for each model. Please provide a little more detail about how the A/C leakage and A/C efficiency credits will be generated for 2012 and 2013 model year vehicles, and (if possible) 2014 and 2015 model year vehicles---similar to the level of detail provided in the EPA templates available at <http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>.

Please advise.

6. Possible Merger of VW and Porsche: Over the past year, there have been some articles in the press about a potential merger of VW & Porsche. If possible, please provide a brief summary of the status of that possible merger and any potential effects on VW's 2013 GHG compliance plans.

In summary, please email us the answers to my questions and send us a corrected 2013 PreMY Report (if needed) as soon as practicable. If you like, we will be glad to schedule a conference call at your convenience to discuss these questions and the potential errors.

Note: I encrypted the attached files using the same password as I used last year when I sent Richard Thomas for the 2013 FE label spreadsheets. I'll call you with the password, just in case you need it.

Thanks

**To:** oliver.schmidt@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/11/2012 5:13:03 PM  
**Subject:** Fw: 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors [Resending]  
<http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>

Oliver,

I'm resending this to your correct email address.

Dave

----- Forwarded by David Good/AA/USEPA/US on 06/11/2012 01:12 PM -----

**From:** David Good/AA/USEPA/US  
**To:** oliver-schmidt@vw.com  
**Cc:** Roberts French/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, leonard.kata@vw.com, dale.harris@vw.com  
**Date:** 06/11/2012 12:58 PM  
**Subject:** 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors

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Please advise.



2. Standards Calculator - Potential error in projected production volume: The projected production volume values listed in the 2013-2015 Standards calculator spreadsheets don't agree with the projected production volume listed in the 2013-2015 fleet average spreadsheets. For example the 2013 car production volume is listed as 565,654 in the 2013 car standards calculator but 550,837 in the 2013 car fleet average spreadsheet. Alos, please note that a standards calculator spreadsheet was not included in your Pre-MY report for 2013 model year trucks.

Please advise.

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Thanks

[attachment "VW-PreMY Rpt-CBI\_DVWXV\_COMMON\_CR1\_CAR\_R02[1]-from Verify-4-20-2012.zip" deleted by David Good/AA/USEPA/US]

**To:** oliver.schmidt@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/11/2012 5:14:25 PM  
**Subject:** Fw: 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors  
[Resending with the attachment]  
[VW-PreMY Rpt-CBI DVWXV COMMON CR1 CAR R02\[1\]-from Verify-4-20-2012.zip](#)  
<http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>

Resending with the attachment this time.

Dave

----- Forwarded by David Good/AA/USEPA/US on 06/11/2012 01:13 PM -----

**From:** David Good/AA/USEPA/US  
**To:** oliver-schmidt@vw.com  
**Cc:** Roberts French/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, leonard.kata@vw.com, dale.harris@vw.com  
**Date:** 06/11/2012 12:58 PM  
**Subject:** 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors

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# Ex. 4 - CBI

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Thanks

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/20/2012 5:32:45 PM  
**Subject:** re: 2013 FE Guide - data in Verify as of 6/15/2012 attached; some have errors  
[VW Group-2013 FE Guide-rel10-all-rel-dates-no-sales-6-15-2012.xlsx](#)

Richard,

Attached is a spreadsheet with all the 2013 FE Label data in Verify as of 6/15/2012.

The data highlighted in green have errors. Please correct the errors when you get a chance.

Note that I'm still sending releasable error-free data to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov) on the 1st and 15th of the month.

Thanks

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/25/2012 9:14:48 PM  
**Subject:** 2013 FE Guide - VW Group data attached  
[VW Group - 2013 FE Guide-rel10-all rel dates-no-sales-6-25-2012.xlsx](#)

Richard,

Here's the 2013 data in Verify as of 6/25/2012 10AM or so. I didn't check it over with a fine tooth comb, but the macro came up with a few errors

Dave

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/27/2012 1:48:06 PM  
**Subject:** RE: 2013 FE Guide - VW Group data attached [Thanks] NNT0

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Date: 06/27/2012 09:35 AM  
Subject: RE: 2013 FE Guide - VW Group data attached

Hi Dave;

I reprocessed four labels indexes: 37, 38, 39 and 70, for the 2.0L Audi models, it was my transposing of the Gas Guzzler MPG and the adjusted combined model type fuel consumption entry fields. Should be no errors now.

The other EPA comments have to do with the relabeling of the A8 and A8L, index 128 and 129, model types due to an addition to the base level with the addition of a model running change and with our letter of June 27, 2012 and revision to the application. The A7 quattro (index # 076) and A6 quattro were added to the test group. The A7 quattro is in the same base level as the A8 and A8L with this engine and transmission combination. This resulted in a slight improvement to the city value only, for the A8 and A8L to 18 MPG from 17 MPG. The release date in Verify is correct at June 22, 2012.

If you have any questions, or suggestion please let me know.

Thanks,  
Richard

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Monday, June 25, 2012 5:15 PM  
To: Thomas, Richard (EEO)  
Subject: 2013 FE Guide - VW Group data attached

Richard,

Here's the 2013 data in Verify as of 6/25/2012 10AM or so. I didn't check it over with a fine tooth comb, but the macro came up with a few errors

Dave

(See attached file: VW Group - 2013 FE Guide-rel10-all rel dates-no-sales-6-25-2012.xlsx)

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 7/3/2012 4:10:33 PM  
**Subject:** re: 2013 FE Guide Errors in Verify; Many errors when calculating adjusted combined fuel consumption(gal/100 miles); Request to update any 2013 Labels submitted before May 11, 2012  
VW Group\_2013 FEGuide1-all rel dates-no-sales-06-29-2012 PLUS new Rel10 fields.xlsx

Richard,

As we discussed over the phone yesterday---you were one of the few manufacturers who calculated fuel consumption correctly---good Job!

Dave

1. Errors in Verify: Attached is a spreadsheet with the 2013 FE Label errors in Verify as of June 29, 2012. The spreadsheet contains all the 2013 FE Label data in Verify as of June 29, 2012 including some of the new Release 10 fields (columns 141-184). Color coding is explained in the heading for each column, except for the various shades of green. Labels with errors are highlighted in green fill in the first few columns or almost all columns---with the field where the error occurred highlighted in yellow fill. [Normal Green (not pea green) means the error occurred in the Combined Adjusted Fuel Consumption (gal/100 miles) field.]

When you get a chance, please correct the errors--so I can forward the corrected data to DOE for posting on the web on the 1st and 15th of each month.

2. Errors in Combined Adjusted Fuel Consumption: I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption" (column 165 of the attached spreadsheet). EPA calculated fuel consumption is in column 166. Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some manufacturers are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as prominently displayed on 2013 labels (window stickers)---as explained in more detail in Item 3, below.

When you get a chance, please correct the fuel consumption errors in Verify. [Note that I'm not currently sending fuel consumption values to DOE for posting on the web, so I don't need the fuel consumption errors corrected immediately. Please correct them as soon as possible, but if you need 2-3 weeks to correct them, that's OK with me.]

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

3. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

4. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at [www.fueleconomy.gov](http://www.fueleconomy.gov) to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. For this reason, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

If possible, please try to update those labels before August 6, 2012. Please call or email me if you need more time to update your labels.

Thanks



**To:** "Harris, Dale (EEO)" [Dale.Harris@vw.com]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 7/6/2012 11:49:37 PM  
**Subject:** 2013 VW greenhouse gas PreMY report questions & potential errors - Revised 6/18/2012 - [more EPA followup questions]

Dale,

Thanks for your response to my questions about the VW 2013 greenhouse gas Pre-Model Year Report. I reviewed your revised templates and still have a few follow-up questions. Here are my comments & questions:

1. 2013 Car fleet average template: The standard is listed as 258 gpm, which doesn't agree with the standard shown on the standards calculator (257 gpm). The AB&T template shows 258gpm.

Please advise.

2. 2013 Truck fleet average template: Looks OK to me & agrees with the data shown on the AB&T template.

3. 2014 Car fleet average template: The total A/C credits (290,345 Mg) doesn't equal the sum of the A/C leakage credits (252,367) and the A/C efficiency credits (328,322). It appears that you have somehow altered the calculations in the EPA fleet average template. As a result, the Total Fleet Average CREE (credit/debit) looks to be in error (-10,762 debits shown instead of 279,835 credits which I calculated).

The AB&T template shows 252,367 A/C leakage credits and 328,322 A/C efficiency credits. The AB&T template shows the Total Fleet Average CREE value of 279,583. It looks like you may have entered unrounded values for the standards (or compliance level---but I can't tell since you included a pdf copy, only. [I'm not too concerned about these rounding differences----especially if you want to use unrounded (more accurate) values----however the final GHG report data which you submit to EPA's Verify data base will be rounded to the nearest whole gpm value.] ).

Please advise.

4. 2014 Truck fleet average template: Looks OK to me but doesn't quite agree with the AB&T template. ).

The fleet average template shows -121,911 debits for the fleet average CREE (w/o A/C credits) while the AB&T template shows -121,570 debits. The fleet average template shows a Total Fleet Average CREE value of 10,223 Mg credits (including A/C credits) while the AB&T template shows 10,564 credits. Again this looks like a minor rounding error to me.

Please advise.

5. 2015 Car fleet average template: Similar to item 3 above, the total A/C credits (303,571 Mg) doesn't

equal the sum of the A/C leakage credits (260,549) and the A/C efficiency credits (346,593). It appears that you have somehow altered the calculations in the EPA fleet average template. As a result, the Total Fleet Average CREE (credit/debit) looks to be in error (-358,487 debits shown instead of -54,915 debits which I calculated--- and which is shown on the AB&T template).

Please advise.

6. 2016 Truck fleet average template: The standard is listed as 291 gpm, which doesn't agree with the standard shown on the standards calculator (294 gpm). The AB&T template shows a standard of 291gpm. Also, similar to item 3 above, the total A/C credits (63,616 Mg) doesn't equal the sum of the A/C leakage credits (50,339) and the A/C efficiency credits (76,893). It appears that you have somehow altered the calculations in the EPA fleet average template. As a result, the Total Fleet Average CREE (credit/debit) looks to be in error -261,964 debits shown instead of -149,511 debits which I calculated.

The AB&T template shows a 291 gpm standard which doesn't agree with the 294 value shown on the standards calculator. The AB&T template shows -325,580 debits for the fleet average CREE (w/o A/C credits) while I calculate -276,473 debits using a standard of 294 gpm. The AB&T template shows a Total Fleet Average CREE value of -198,348 Mg debits (including A/C credits) while I calculate -149,511 Mg debits).

Please advise.

7. AB&T Template: Thanks for entering the 2013, 2014 & 2015 summary information into one AB&T spreadsheet---- unfortunately you deleted the 2009-2011 credit/debit summary. If possible, please add the 2009-2011 credit/debits back into the AB&T spreadsheet. Also if possible, please use the values from your 2009-2011 Early Credit report which you sent to Rob French---with a note that that's where they came from and whether they are preliminary values or final values which you and Rob have agreed upon. [Both VW and EPA will need to keep good records in this spreadsheet as it gets updated each year----because it will be a while before EPA will begin tracking this information in Verify. [If you want to send me the AB&T spreadsheet (in Excel—not a pdf), I'll be glad to enter VW's 2009-2011 car & truck credits which Rob French gave me. Then I'll send it back to you for final editing.]

Please advise.

8. Potential Merger of VW & Porsche: Thanks for the information about the status of the VW's acquisition of Porsche. My supervisor, Linc Wehrly, said he heard in the news yesterday that VW has plans to buy controlling interest in Porsche which is scheduled to become effective on August 1, 2012 or so. My reading of the GHG & CAFE regulations is that both defer to NHTSA Successor & Predecessor regulations. For example the provisions of 49 CFR 534.5 (b) read "A manufacturer is considered to be within a control relationship for an entire model year if and only if it is within that relationship on September 30 of the calendar year in which the model year ends." My understanding is that the basis for a "control relationship" can be 1) control of the design, calibration, etc., of the vehicle(s) or 2) corporate ownership control (e.g. owning more than 50% of a company). Call me at 734-214-4450 if you would like to discuss this a little more.

It might be worthwhile to have a meeting on all the impacts of this, including how to handle EPA certification, FE labeling, IUVP, CAFE, Greenhouse gas reporting, certificate language, etc after you and Porsche have had time to work out a plan---or at least you should document your plans in a letter to EPA.

Thanks

Dave

From: "Harris, Dale (EEO)" <Dale.Harris@vw.com>

To: David Good/AA/USEPA/US@EPA  
Cc: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>, "Schmidt, Oliver (EEO)" <Oliver.Schmidt@vw.com>  
Date: 06/18/2012 10:07 AM  
Subject: RE: 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors - Revised 6/18/2012

Dave

Attached are updated documents that address the issues identified within you most recent email. In addition I have included responses to the each of the identified issues in red below. Furthermore a statement has been included that address the uncertainty associated with Porsche. Please let me know if there are any additional questions. Thanks!

1. Potential error in your fleet average calculations: Using the projected CREE fleet average estimates and CREE standards listed in your (attached) 2013 Pre-MY report spreadsheet, I come up with slightly different results for the total "Model Year Credits (Debits)" fields for car and trucks for 2012-2015 model years. For example, my calculations for 2013-2015 model year result in the following credit (Megagram) values:

Category	D.Good CREE Calcs	VW CREE values	Comments
2013 Pass Car	(730,335)	(778,903)	
2013 Light Truck	87,527	87,527	
agrees with VW			
2014 Pass Car	(79,674)	(91,543)	
2014 Light Truck	(16,902)	(17,244)	
2015 Pass Car	(424,806)	(395,074)	
2015 Light Truck	(272,380)	(275,812)	

My calculations, for example, for 2013 cars are  $[(258 - 269)(550,837)(195,264)/1,000,000] - 404,242$  (A/C credits) = 778,903 credits. It looks like your calculations are not rounding the CREE standards and fleet average CREE values to the nearest whole gram/mile, as required by EPA regulations.

Please advise.

Attached are updated documents where CREE Fleet Average estimates have been corrected by using the appropriate rounding technique.

**Ex. 4 - CBI**

Please advise.

EPA Calculator documents have been updated to correct errors in projected planning volumes. Planning volumes are now aligned throughout the report MY 2013 – 2015.

3. Bugatti: Bugati models appear to be missing in your 2013-2015 templates.

Please advise  
Bugatti planning volumes not available.

4. Three AB&T Spreadsheets: Your report contains three AB&T spreadsheets. None of them include projections for 2014 or 2015 model year credits. Please combine the three spreadsheets into one AB&T spreadsheet which includes a listing for 2014 and 2015 credits.

Please advise.  
AB&T spreadsheet has been updated with MY 2013 – 2015 appearing on 1 spreadsheet as requested.

5. A/C Leakage and Efficiency Credits: Your 2013 Pre-MY report doesn't contain any details of how the A/C credits were generated for each model. Please provide a little more detail about how the A/C leakage and A/C efficiency credits will be generated for 2012 and 2013 model year vehicles, and (if possible) 2014 and 2015 model year vehicles---similar to the level of detail provided in the EPA templates available at <http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>.

Please advise.  
Support documentation has been provided that demonstrates how credits were generated for each model.

6. Possible Merger of VW and Porsche: Over the past year, there have been some articles in the press about a potential merger of VW & Porsche. If possible, please provide a brief summary of the status of that possible merger and any potential effects on VW's 2013 GHG compliance plans.

"On September 8, 2011, Volkswagen AG announced that the planned merger with Porsche Automobile Holding SE (Porsche SE) cannot be implemented within the time frame laid down in the Comprehensive Agreement. The decision was reached by the Board of Management of Volkswagen AG following discussions with Porsche SE. Nevertheless, all parties remain committed to the goal of creating an integrated automotive group with Porsche and are convinced that they will succeed in doing so.

The existing legal hurdles, and particularly those resulting from the ongoing proceedings and actions against Porsche SE in Germany and the USA due to alleged market manipulation, made it impossible from Volkswagen's perspective to quantify the economic risks and hence to arrive at a valuation for Porsche SE that could be used to determine the exchange ratio.

Over the past months, Volkswagen AG and Porsche SE have conducted in-depth examinations of whether there are other possibilities, in addition to the put/call options contained in the Comprehensive Agreement, that can be implemented by all parties involved in order to achieve the goal of creating the integrated automotive group with Porsche [AG, the operating business,] on economically feasible terms [earlier than 2014]. These examinations are still ongoing."

Regards,  
Dale Harris  
Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office (EEO)  
3800 Hamlin  
AuburnHills Michigan 48326  
United States of America

P: +1 248 754-4218  
E: Dale.Harris@vw.com

[attachment "winmail.dat" deleted by David Good/AA/USEPA/US] [attachment "message\_body.rtf" deleted by David Good/AA/USEPA/US] [attachment "2013 Pre MY Report.pdf" deleted by David Good/AA/USEPA/US]

**To:** hopsonjl@ornl.gov[]  
**Cc:** gibsonrc@ornl.gov;richard.thomas@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; ichard.thomas@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 7/18/2012 9:45:44 PM  
**Subject:** Fw: Bentley Flexible Fueled Models and Driving Range

Janet,

VW was wondering about the "miles on a tankful" information on the website.

Please advise---when you get a chance, especially about the VW models.

I'm thinking that very few Bentley customers are interested in the fuel economy (or miles on a tankful)--- but the press use the site for background information (which eventually gets out to the public). It's probably a different story for VW customers.

Dave

----- Forwarded by David Good/AA/USEPA/US on 07/18/2012 05:38 PM -----

**From:** "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
**To:** David Good/AA/USEPA/US@EPA  
**Cc:** "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
**Date:** 07/18/2012 12:16 PM  
**Subject:** Bentley Flexible Fueled Models and Driving Range

Hi Dave;

As we discussed on the phone, the miles on a tank values were missing on the fuel economy guide web site for the four 6.0L Bentley flexible fueled (E85) Continental models. They are the Continental GT, Continental GTC, Continental Flying Spur and the Continental Supersports Convertible. The fuel tank volume for these models is 23.8 US gallons. I understand from our discussion that the miles on a tank is not the same value we calculate per the requirements and that must appear on the fuel economy label for each of the fuels (gasoline and E85) on a flexible fueled model.

I noticed that many of the Audi gasoline and Diesel fueled models have a value for the "miles on a tank", however none of the Volkswagen models have this listed. If possible, we would like to see the "miles on a tank" on these high volume, fuel efficient Volkswagen models as well.

Thanks,  
Richard  
[attachment "winmail.dat" deleted by David Good/AA/USEPA/US]

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com[];  
liver.schmidt@vw.com[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 7/19/2012 9:36:12 PM  
**Subject:** re: 2013 FE Guide - Data in EPA's Verify data base as of 7/17/2012 attached;  
VW Group 2013 FE Guide-all-rel-dates-no-sales-7-17-2012.xlsx

Richard,

Thanks for making corrections and updating your 2013 labels over the past two weeks. Our macro didn't pick up any errors in the data currently in Verify.

Attached is a spreadsheet with all the 2013 FE Labels in Verify as of July 17, 2012.

Note that (as will be outlined in a forthcoming EPA guidance letter) the last day for manufacturers to make changes for the 2013 Printed Guide is August 29, 2012.

FYI----I'll include my previous email message to you from July 2, 2012 since it has a few more details about calculating fuel consumption value (gallons/100 miles).

As usual, thanks for your help.

Dave

**From:** David Good/AA/USEPA/US  
**To:** richard.thomas@vw.com  
**Cc:** oliver.schmidt@vw.com, Jim Snyder/AA/USEPA/US@EPA, Roberts French/AA/USEPA/US@EPA  
**Date:** 07/03/2012 12:10 PM  
**Subject:** re: 2013 FE Guide Errors in Verify; Many errors when calculating adjusted combined fuel consumption(gal/100 miles); Request to update any 2013 Labels submitted before May 11, 2012

Richard,

As we discussed over the phone yesterday---you were one of the few manufacturers who calculated fuel consumption correctly---good Job!

Dave

1. Errors in Verify: Attached is a spreadsheet with the 2013 FE Label errors in Verify as of June 29, 2012. The spreadsheet contains all the 2013 FE Label data in Verify as of June 29, 2012 including some of the new Release 10 fields (columns 141-184). Color coding is explained in the heading for each column, except for the various shades of green. Labels with errors are highlighted in green fill in the first few columns or almost all columns---with the field where the error occurred highlighted in yellow fill. [Normal Green (not pea green) means the error occurred in the Combined Adjusted Fuel Consumption (gal/100 miles) field.]

When you get a chance, please correct the errors--so I can forward the corrected data to DOE for posting on the web on the 1st and 15th of each month.

2. Errors in Combined Adjusted Fuel Consumption: I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption" (column 165 of the attached spreadsheet). EPA calculated fuel consumption is in column 166. Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some manufacturers are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as prominently displayed on 2013 labels (window stickers)---as explained in more detail in Item 3, below.

When you get a chance, please correct the fuel consumption errors in Verify. [Note that I'm not currently sending fuel consumption values to DOE for posting on the web, so I don't need the fuel consumption errors corrected immediately. Please correct them as soon as possible, but if you need 2-3 weeks to correct them, that's OK with me.]

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

3. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

4. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at [www.fueleconomy.gov](http://www.fueleconomy.gov) to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values), adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. For this reason, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

If possible, please try to update those labels before August 6, 2012. Please call or email me if you need more time to update your labels.

Thanks

[attachment "VW\_Group\_2013 FEGuide1-all rel dates-no-sales-06-29-2012 PLUS new Rel10 fields.xlsx" deleted by David Good/AA/USEPA/US]





**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 7/27/2012 12:45:08 PM  
**Subject:** 2013 FE Guide - data as of 7/26/2012 attached  
[VW Group 2013 FE Guide--all rel dates-no-sales-7-26-2012.xlsx](#)

Richard,

Please take a look at the errors that our macro flagged. Let me know if you think any of them should not have been flagged.

Thanks

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 7/27/2012 10:41:49 PM  
**Subject:** Fw: 2013 FE Guide - data as of 7/26/2012 attached  
VW\_Group\_2013 FEGuide--all rel dates-no-sales-7-26-2012-w-7-27-4PM macro.xlsx

Richard,

Per my voicemail message, attached is the 7/26/2012 run with an updated macro. Hopefully most of the rounding errors have disappeared.

Please take a look at the errors that our macro flagged. Let me know if you think any of them should not have been flagged.

Regards---I'm out on Monday, back on Tues.

Dave

----- Forwarded by David Good/AA/USEPA/US on 07/27/2012 06:18 PM -----

**From:** David Good/AA/USEPA/US  
**To:** richard.thomas@vw.com  
**Date:** 07/27/2012 08:45 AM  
**Subject:** 2013 FE Guide - data as of 7/26/2012 attached

Richard,

Please take a look at the errors that our macro flagged. Let me know if you think any of them should not have been flagged.

Thanks

[attachment "VW\_Group\_2013 FEGuide--all rel dates-no-sales-7-26-2012.xlsx" deleted by David Good/AA/USEPA/US]

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 7/31/2012 6:24:39 PM  
**Subject:** Fw: 2013 FE Guide - data as of 7/31/2012 attached  
VW\_Group\_2013\_FEGuide-all\_rel\_dates-no-sales-7-31-2012-w-7-31\_macro.xlsx

Richard,

Attached is the data in Verify as of 7/31/2012 at 10AM or so.

The macro has been changed several times---it seems "good to go." Please let me know if you find any errors flagged by the macro that might not be errors.

Thanks

Dave

----- Forwarded by David Good/AA/USEPA/US on 07/31/2012 02:19 PM -----

**From:** David Good/AA/USEPA/US  
**To:** richard.thomas@vw.com  
**Date:** 07/27/2012 06:41 PM  
**Subject:** Fw: 2013 FE Guide - data as of 7/26/2012 attached

Richard,

Per my voicemail message, attached is the 7/26/2012 run with an updated macro. Hopefully most of the rounding errors have disappeared.

Please take a look at the errors that our macro flagged. Let me know if you think any of them should not have been flagged.

Regards---I'm out on Monday, back on Tues.

Dave

[attachment "VW\_Group\_2013\_FEGuide--all\_rel\_dates-no-sales-7-26-2012-w-7-27-4PM\_macro.xlsx"  
deleted by David Good/AA/USEPA/US]

----- Forwarded by David Good/AA/USEPA/US on 07/27/2012 06:18 PM -----

**From:** David Good/AA/USEPA/US  
**To:** richard.thomas@vw.com  
**Date:** 07/27/2012 08:45 AM  
**Subject:** 2013 FE Guide - data as of 7/26/2012 attached

Richard,

Please take a look at the errors that our macro flagged. Let me know if you think any of them should not

have been flagged.

Thanks

[attachment "VW\_Group\_2013 FEGuide--all rel dates-no-sales-7-26-2012.xlsx" deleted by David Good/AA/USEPA/US]

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/3/2012 7:18:51 PM  
**Subject:** 2013 FE Guide - Data in Verify as of 8/3/2012 attached  
[VW Group 2013 FE Guide-all-rel-dates-no-sales-8-3-2012.xlsx](#)

Richard,

Here you go. It looks a lot better to me. Thanks for correcting the errors. Have fun on your vacation.

Dave

**To:** "Johnson, Stuart (EEO)" [Stuart.Johnson@vw.com]  
**Cc:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/7/2012 4:13:44 PM  
**Subject:** Re: VW Porsche Aggregation Meeting - Thurs (8/9/12) at 3:30 PM

Stuart,

I included you, Len and Oliver when I scheduled the Thurs 3:30 meeting---didn't know exactly who would be coming. Please let me know if you think you'll need more than 1.5 hours.

[I invited some of our new engineers---and cc'd a few EPA folks that I don't expect will need to come.]

If possible, please send use the presentation or a one-pager ahead of time.

Also, for some reason I don't have your phone number.

See you Thursday.

Dave

From: "Johnson, Stuart (EEO)" <Stuart.Johnson@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Date: 08/06/2012 01:08 PM  
Subject: VW Porsche Aggregation Meeting

Hello Dave,

Good to talk to you today. I wanted to confirm a meeting with EPA on Thursday August 9th @ 3:30 pm to discuss the implications of the merger of VW and Porsche. We would like to discuss all aspects of the merger as it pertains to regulatory requirements but in particular we would like to discuss the merger with regards timing of aggregating for the GHG regulation. When we review the regulation there seems to be uncertainty regarding when VW and Porsche will have to merge their fleets.

Thank you and looking forward to the discussion this Thursday.

Best Regards,

Stuart

**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Tue 8/7/2012 6:02:08 PM  
**Subject:** Accepted: VW/EPA mtg - Merger of VW & Porsche



**To:** David Good/AA/USEPA/US@EPA[]  
**From:** "Schmidt, Oliver (EEO)"  
**Sent:** Tue 8/7/2012 6:16:58 PM  
**Subject:** Accepted: VW/EPA mtg - Merger of VW & Porsche

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/7/2012 10:12:47 PM  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of Aug 7, 2012 with new macro;  
please make corrections by August 15 if possible  
[VW Group 2013 FE Guide-all rel dates-no-sales-8-7-2012.xlsx](#)

Richard,

I hope your vacation is going well and you don't open this until you get back to the office.

,

I corrected the macro so the rounded adjusted combined CO2 error check is now accurate. Attached are the data in Verify as 10 AM on Aug 7, 2012. Please make any needed corrections in the next two weeks if possible. The last day to make corrections for the Printed Guide is August 29, 2012.

Note that I didn't have time to double check and clean up the error messages in column 1& 2 of the spreadsheet--errors are pretty much as flagged by the macro.

As a reminder, please start emailing me an excel spreadsheet with any 2013 alternative fuel/new technology placeholder vehicles (2013 vehicles for which the fuel economy will not be available by August 29, 2012). For more information about sending us your placeholder vehicles, please see Enclosure 2, Section 3 of the recent EPA guidance letter which was sent out on Monday (CD-12-10 Subject: Fuel Economy Label Information for 2013 Model Year).

I'll include my notes from previous emails for your convenience.

As usual, thanks for your help.

Dave

----- Forwarded by David Good/AA/USEPA/US on 08/07/2012 04:38 PM -----

**From:** David Good/AA/USEPA/US  
**To:** Manufacturers fuel economy contact folks  
**Date:** 08/07/2012 09:09 AM  
**Subject:** 2013 FE Guide - EPA error in the data which I sent you on Friday Aug 3, 2012 - rounded adjusted combined CO2

Heads up to all:

There is an error in the EPA macro when checking the accuracy of the adjusted combined CO2 values for labels calculated with the derived 5-cycle method.

The macro use the weighted average of the unrounded city and highway values (55%/45% weighting)--- with the result rounded to the whole gpm value. It should have use the weighted average of the city & highway CO2 values rounded to tenths of a gram/mile, ref 40 CFR 600.210-12(c)(2) which references

paragraphs 600.210-12(a)(2)(i)(B) and (a)(2)(ii)(B).

Hopefully, this rounding error won't affect very many labels in the data which I sent out to manufacturers on Friday August 3rd.

I'll correct the macro and send you another spreadsheet this afternoon.

Dave

re: 2013 FE Guide - Errors in EPA's Verify data base as of 8/1/2012; please make corrections by Aug 15, 2012

Attached is a spreadsheet with all the 2013 FE Labels in Verify as of August 1, 2012. Please correct any errors as soon as you can, by August 15, 2012 if possible. As you begin to correct the errors, please let me know if you need an up-to-date query of the data in Verify--e.g. next week or so and I'll be glad it to you.

1. Correcting Errors: As usual, the errors and my comments are shown in the first two columns of the spreadsheet. Green fill in the first few columns means our macro detected an error. Pea green fill means the error occurred in the Verify Release 9 information. Labels with pea green errors will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov) until the (pea green) error has been corrected.

Dark green fill in the first few columns of the spreadsheet means that an error occurred in the new Verify Release 10 information (columns 141-185 of the spreadsheet) . Labels with dark green errors will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov) after August 15, 2012. In addition, they will not be included in the Printed until the errors are corrected. [Some of the new (Release 10) information will be listed on [www.fueleconomy.gov](http://www.fueleconomy.gov) in late August or early September, 2012. We may also include the Greenhouse gas 1-10 rating in the 2013 Printed Guide---so please correct these dark green errors by mid-August, 2012 at the latest (or for Japanese manufacturers, before Japan goes on vacation on August 10, 2012).

Note that (as will be outlined in a forthcoming EPA guidance letter) the last day for manufacturers to make changes for the 2013 Printed Guide is August 29, 2012.

2. Voluntarily lowered Fuel Economy: For labels which you voluntarily lowered the mpg of your vehicles, EPA regulations require that you also increase the CO2 accordingly. Calculating the voluntarily increased combined CO2 value is fairly easy (knowing the unrounded adjusted mpg value, the rounded, voluntarily lowered mpg value, and the unrounded adjusted CO2 value). Our macro will check the voluntarily increased city, highway and combined CO2 value for errors using the formula in the following example:

Given:

unrounded adjusted combined mpg = 21.6949 mpg

unrounded adjusted combined CO2 = 408.4 gpm

Voluntarily lowered Label mpg = 20 mpg

Then: Voluntarily increased CO2 =  $(21.6949 \text{ mpg} \times 408.4 \text{ gpm}) / 20 \text{ mpg} = 443.01 \text{ gpm}$ ; which rounds to 443 gpm CO2

3. Errors in Combined Adjusted Fuel Consumption: As indicated in a previous email to most manufacturers, I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption." Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as listed prominently on the 2013 labels (window stickers)---as explained in more detail in Item 4, below.

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

4. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c)): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

5. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at [www.fueleconomy.gov](http://www.fueleconomy.gov) to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. For this reason, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/16/2012 7:33:18 PM  
**Subject:** 2013 FE Guide - Data in Verify attached  
[VW Group 2013 FE Guide--all-rel-dates-no-sales-8-16-2012.xlsx](#)

Richard,

Here's the latest data in Verify---about 2 or 3PM, today. I didn't have time to clean up the duplicates, EV errors, color code the release dates, etc---it's just as output by the macro. I'm not sure what the error - Mfr vs EPA derived transmission differences is. It may be a problem with the macro. I thought we fixed the macro for that one two weeks ago.

Dave

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/17/2012 7:06:21 PM  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of Aug 15, 2012; last day to make corrections for the Printed Guide is Aug 29, 2012  
[VW Group 2013 FE Guide-all rel dates-no-sales-8-15-2012.xlsx](#)

Richard

I'll send you the data in Verify as of Aug 15---even though I sent you an updated dataset yesterday. The Aug 15 dataset was double checked more thoroughly, includes the possible error regarding Stop-Start vehicles, etc. Thanks for your help correcting errors over the past month or so.

Attached are the data in Verify as of Aug 15, 2012. Please make any needed corrections (including corrections to the Verify Release 10 fields) as soon as possible. The last day to make corrections for the Printed Guide is August 29, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Aug 16, 2012 for posting on the web. In the future, labels with pea green or dark green fill in the first few columns will not be sent to DOE for posting on the web. (Pea green fill means the error occurred in one of the Verify Release 9 fields. Dark green fill means an error occurred in one of the new Verify Release 10 fields.)

As you begin to correct the errors, please let me know if you need an up-to-date query of the data in Verify--e.g. next week or so and I'll be glad to email it to you.

Placeholder vehicles for the 2013 Printed Guide: As a reminder, please email me an excel spreadsheet with any 2013 alternative fuel/new technology placeholder vehicles (2013 vehicles for which the fuel economy will not be available by August 29, 2012)---including diesel vehicles, CNG vehicles, Electric vehicles, conventional hybrid vehicles, plug-in hybrid vehicles, FFVs and fuel cell vehicles. For more information about sending us your placeholder vehicles, please see Enclosure 2, Section 3 of the recent EPA guidance letter which was sent out on Monday (CD-12-10 Subject: Fuel Economy Label Information for 2013 Model Year). I need a spreadsheet with your placeholder vehicles by August 29, 2012.

I'll include my (edited) notes from previous emails for your convenience.

As usual, thanks for your help.

Dave

Edited notes from my previous email messages:

1. Correcting Errors: As usual, the errors and my comments are shown in the first two columns of the spreadsheet. Green fill in the first few columns means our macro detected an error. Labels with errors will not be included in the 2013 Printed Guide until the errors are corrected.

2. Voluntarily lowered Fuel Economy: For labels which you voluntarily lowered the mpg of your vehicles, EPA regulations require that you also increase the CO2 accordingly. Calculating the voluntarily increased combined CO2 value is fairly easy (knowing the unrounded adjusted mpg value, the rounded, voluntarily

lowered mpg value, and the unrounded adjusted CO2 value). Our macro will check the voluntarily increased city, highway and combined CO2 value for errors using the formula in the following example:

Given:

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unrounded adjusted combined CO2 = 408.4 gpm

Voluntarily lowered Label mpg = 20 mpg

Then: Voluntarily increased CO2 =  $(21.6949 \text{ mpg} \times 408.4 \text{ gpm}) / 20 \text{ mpg} = 443.01 \text{ gpm}$ ; which rounds to 443 gpm CO2

3. Errors in Combined Adjusted Fuel Consumption: As indicated in a previous email to most manufacturers, I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption." Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as listed prominently on the 2013 labels (window stickers)---as explained in more detail in Item 4, below.

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

4. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate =  $(100/\text{adjusted combined MPG})$ , where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate =  $(100/\text{adjusted combined MPG})$ , where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

5. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at [www.fueleconomy.gov](http://www.fueleconomy.gov) to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. In addition, the Greenhouse Gas 1-10 score will be shown in the 2013 Printed Guide. For these reasons, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

**To:** "Harris, Dale (EEO)" [Dale.Harris@vw.com]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; liver.schmidt@vw.com;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 8/20/2012 4:38:01 PM  
**Subject:** RE: 2013 VW greenhouse gas PreMY report questions & potential errors - VW revision 7/9/2012 - [EPA calcs now agree with your revised calculations]  
[@vw.com](mailto:vw.com)  
[Dale.Harris@vw.com](mailto:Dale.Harris@vw.com)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)  
[Oliver.Schmidt@vw.com](mailto:Oliver.Schmidt@vw.com)  
<http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>  
[Dale.Harris@vw.com](mailto:Dale.Harris@vw.com)  
(embedded image)

Dale,

Thanks for making the corrections, responding to my email questions, etc.

I double checked your revised values and my calculations now agree with your calculations (minus Porsche and Bugatti). In addition, I didn't check your detailed A/C efficiency or A/C leakage projected credits for 2013-2015 model year.

Regards

From: "Harris, Dale (EEO)" <Dale.Harris@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Cc: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
Date: 07/09/2012 01:45 PM  
Subject: RE: 2013 VW greenhouse gas PreMY report questions & potential errors - Revised 6/18/2012 - [more EPA followup questions]

Rob

Attached are documents and responses to the several issues identified below. Please let me know if there are any additional questions. Thanks!!!

1. 2013 Car fleet average template: The standard is listed as 258 gpm, which doesn't agree with the standard shown on the standards calculator (257 gpm). The AB&T template shows 258gpm.

Changed fleet standards to align with EPA calculator at 257 gpm. Attached file '2013 Pre MY PC.pdf'.

2. 2014 Car fleet average template: The total A/C credits (290,345 Mg) doesn't equal the sum of the A/C



leakage credits (252,367) and the A/C efficiency credits (328,322). It appears that you have somehow altered the calculations in the EPA fleet average template. As a result, the Total Fleet Average CREE (credit/debit) looks to be in error (-10,762 debits shown instead of 279,835 credits which I calculated).

Corrected an error in the EPA 2014 fleet average template where AC Credit values were not being summed properly. Attached file '2014 Pre MY PC.pdf'.

5. 2015 Car fleet average template: Similar to item 3 above, the total A/C credits (303,571 Mg) doesn't equal the sum of the A/C leakage credits (260,549) and the A/C efficiency credits (346,593). It appears that you have somehow altered the calculations in the EPA fleet average template. As a result, the Total Fleet Average CREE (credit/debit) looks to be in error (-358,487 debits shown instead of -54,915 debits which I calculated---and which is shown on the AB&T template).

Corrected an error in the EPA 2014 fleet average template where AC Credit values were not being summed properly. Attached file '2015 Pre MY PC.pdf'.

6. 2015 Truck fleet average template: The standard is listed as 291 gpm, which doesn't agree with the standard shown on the standards calculator (294 gpm). The AB&T template shows a standard of 291gpm. Also, similar to item 3 above, the total A/C credits (63,616 Mg) doesn't equal the sum of the A/C leakage credits (50,339) and the A/C efficiency credits (76,893). It appears that you have somehow altered the calculations in the EPA fleet average template. As a result, the Total Fleet Average CREE (credit/debit) looks to be in error -261,964 debits shown instead of -149,511 debits which I calculated.

Changed fleet standards to align with EPA calculator at 294 gpm. Attached file '2015 Pre MY LDT.pdf'.

Corrected an error in the EPA 2015 fleet average template where AC Credit values were not being summed properly. Attached file '2015 Pre MY LDT.pdf'.

7. AB&T Template: Thanks for entering the 2013, 2014 & 2015 summary information into one AB&T spreadsheet----unfortunately you deleted the 2009-2011 credit/debit summary. If possible, please add the 2009-2011 credit/debits back into the AB&T spreadsheet. Also if possible, please use the values from your 2009-2011 Early Credit report which you sent to Rob French---with a note that that's where they came from and whether they are preliminary values or final values which you and Rob have agreed upon. [Both VW and EPA will need to keep good records in this spreadsheet as it gets updated each year----because it will be a while before EPA will begin tracking this information in Verify. [If you want to send me the AB&T spreadsheet (in Excel—not a pdf), I'll be glad to enter VW's 2009-2011 car & truck credits which Rob French gave me. Then I'll send it back to you for final editing.]

Added MY2009 – 2011 summary data into the MY2013 -2015 AB&T Template as requested. The data values from MY2009 – 2011 are from the 2009 – 2011 Early Credit Report sent to Rob French. The values are indeed final values for the given model years 2009 - 2011. Attached file '2009 – 2015 Pre MYAB&T.xls'.

Regards,  
Dale Harris  
Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office (EEO)  
3800 Hamlin  
AuburnHills Michigan 48326  
United States of America

P: +1 248 754-4218  
E: Dale.Harris@vw.com

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Friday, July 06, 2012 7:50 PM  
To: Harris, Dale (EEO)  
Cc: Kata, Leonard (EEO); Schmidt, Oliver (EEO); Roberts French; Tom Anderson; Linc Wehrly  
Subject: 2013 VW greenhouse gas PreMY report questions & potential errors - Revised 6/18/2012 - [more EPA followup questions]

Dale,

Thanks for your response to my questions about the VW 2013 greenhouse gas Pre-Model Year Report. I reviewed your revised templates and still have a few follow-up questions. Here are my comments & questions:

1. 2013 Car fleet average template: The standard is listed as 258 gpm, which doesn't agree with the standard shown on the standards calculator (257 gpm). The AB&T template shows 258gpm.

Please advise.

2. 2013 Truck fleet average template: Looks OK to me & agrees with the data shown on the AB&T template.

3. 2014 Car fleet average template: The total A/C credits (290,345 Mg) doesn't equal the sum of the A/C leakage credits (252,367) and the A/C efficiency credits (328,322). It appears that you have somehow altered the calculations in the EPA fleet average template. As a result, the Total Fleet Average CREE (credit/debit) looks to be in error (-10,762 debits shown instead of 279,835 credits which I calculated).

The AB&T template shows 252,367 A/C leakage credits and 328,322 A/C efficiency credits. The AB&T template shows the Total Fleet Average CREE value of 279,583. It looks like you may have entered unrounded values for the standards (or compliance level---but I can't tell since you included a pdf copy, only. [I'm not too concerned about these rounding differences---especially if you want to use unrounded (more accurate) values---however the final GHG report data which you submit to EPA's Verify data base will be rounded to the nearest whole gpm value.] ).

Please advise.

4. 2014 Truck fleet average template: Looks OK to me but doesn't quite agree with the AB&T template. ).

The fleet average template shows -121,911 debits for the fleet average CREE (w/o A/C credits) while the AB&T template shows -121,570 debits. The fleet average template shows a Total Fleet Average CREE value of 10,223 Mg credits (including A/C credits) while the AB&T template shows 10,564 credits. Again this looks like a minor rounding error to me.

Please advise.

5. 2015 Car fleet average template: Similar to item 3 above, the total A/C credits (303,571 Mg) doesn't equal the sum of the A/C leakage credits (260,549) and the A/C efficiency credits (346,593). It appears that you have somehow altered the calculations in the EPA fleet average template. As a result, the Total Fleet Average CREE (credit/debit) looks to be in error (-358,487 debits shown instead of -54,915 debits which I calculated---and which is shown on the AB&T template).

Please advise.

6. 2016 Truck fleet average template: The standard is listed as 291 gpm, which doesn't agree with the standard shown on the standards calculator (294 gpm). The AB&T template shows a standard of 291gpm. Also, similar to item 3 above, the total A/C credits (63,616 Mg) doesn't equal the sum of the A/C leakage credits (50,339) and the A/C efficiency credits (76,893). It appears that you have somehow altered the calculations in the EPA fleet average template. As a result, the Total Fleet Average CREE (credit/debit) looks to be in error -261,964 debits shown instead of -149,511 debits which I calculated.

The AB&T template shows a 291 gpm standard which doesn't agree with the 294 value shown on the standards calculator. The AB&T template shows -325,580 debits for the fleet average CREE (w/o A/C credits) while I calculate -276,473 debits using a standard of 294 gpm. The AB&T template shows a Total Fleet Average CREE value of -198,348 Mg debits (including A/C credits) while I calculate -149,511 Mg debits).

Please advise.

7. AB&T Template: Thanks for entering the 2013, 2014 & 2015 summary information into one AB&T spreadsheet----unfortunately you deleted the 2009-2011 credit/debit summary. If possible, please add the 2009-2011 credit/debits back into the AB&T spreadsheet. Also if possible, please use the values from your 2009-2011 Early Credit report which you sent to Rob French---with a note that that's where they came from and whether they are preliminary values or final values which you and Rob have agreed upon. [Both VW and EPA will need to keep good records in this spreadsheet as it gets updated each year----because it will be a while before EPA will begin tracking this information in Verify. [If you want to send me the AB&T spreadsheet (in Excel—not a pdf), I'll be glad to enter VW's 2009-2011 car & truck credits which Rob French gave me. Then I'll send it back to you for final editing.]

Please advise.

8. Potential Merger of VW & Porsche: Thanks for the information about the status of the VW's acquisition of Porsche. My supervisor, Linc Wehrly, said he heard in the news yesterday that VW has plans to buy controlling interest in Porsche which is scheduled to become effective on August 1, 2012 or so. My reading of the GHG & CAFE regulations is that both defer to NHTSA Successor & Predecessor regulations. For example the provisions of 49 CFR 534.5 (b) read "A manufacturer is considered to be within a control relationship for an entire model year if and only if it is within that relationship on September 30 of the calendar year in which the model year ends." My understanding is that the basis for a "control relationship" can be 1) control of the design, calibration, etc., of the vehicle(s) or 2) corporate ownership control (e.g. owning more than 50% of a company). Call me at 734-214-4450 if you would like to discuss this a little more.

It might be worthwhile to have a meeting on all the impacts of this, including how to handle EPA certification, FE labeling, IUVP, CAFE, Greenhouse gas reporting, certificate language, etc after you and Porsche have had time to work out a plan---or at least you should document your plans in a letter to EPA.

Thanks

Dave

"Harris, Dale (EEO)" ---06/18/2012 10:07:25 AM---Dave Attached are updated documents that address the issues identified within you most recent email.

From: "Harris, Dale (EEO)" <Dale.Harris@vw.com>

To: David Good/AA/USEPA/US@EPA

Cc: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>, "Schmidt, Oliver (EEO)" <Oliver.Schmidt@vw.com>

Date: 06/18/2012 10:07 AM

Subject: RE: 2013 light-duty Greenhouse gas - 2013 PreMY report questions & potential errors - Revised 6/18/2012

Dave

Attached are updated documents that address the issues identified within your most recent email. In addition, I have included responses to each of the identified issues in red below. Furthermore, a statement has been included that addresses the uncertainty associated with Porsche. Please let me know if there are any additional questions. Thanks!

1. Potential error in your fleet average calculations: Using the projected CREE fleet average estimates and CREE standards listed in your (attached) 2013 Pre-MY report spreadsheet, I come up with slightly different results for the total "Model Year Credits (Debits)" fields for cars and trucks for 2012-2015 model years. For example, my calculations for 2013-2015 model year result in the following credit (Megagram) values:

Category	D	Good CREE Calcs	VW CREE values	Comments
2013 Pass Car	(730,335)	(778,903)		
2013 Light Truck	87,527	87,527		
agrees with VW				
2014 Pass Car	(79,674)	(91,543)		
2014 Light Truck	(16,902)	(17,244)		
2015 Pass Car	(424,806)	(395,074)		
2015 Light Truck	(272,380)	(275,812)		

My calculations, for example, for 2013 cars are  $[(258 - 269)(550,837)(195,264)/1,000,000] - 404,242 \text{ (A/C credits)} = 778,903$  credits. It looks like your calculations are not rounding the CREE standards and fleet average CREE values to the nearest whole gram/mile, as required by EPA regulations.

Please advise.

Attached are updated documents where CREE Fleet Average estimates have been corrected by using the appropriate rounding technique.

## Ex. 4 - CBI

Please advise.

EPA Calculator documents have been updated to correct errors in projected planning volumes. Planning volumes are now aligned throughout the report MY 2013 – 2015.

3. Bugatti: Bugatti models appear to be missing in your 2013-2015 templates.

Please advise  
Bugatti planning volumes not available.

4. Three AB&T Spreadsheets: Your report contains three AB&T spreadsheets. None of them include projections for 2014 or 2015 model year credits. Please combine the three spreadsheets into one AB&T spreadsheet which includes a listing for 2014 and 2015 credits.

Please advise.  
AB&T spreadsheet has been updated with MY 2013 – 2015 appearing on 1 spreadsheet as requested.

5. A/C Leakage and Efficiency Credits: Your 2013 Pre-MY report doesn't contain any details of how the A/C credits were generated for each model. Please provide a little more detail about how the A/C leakage and A/C efficiency credits will be generated for 2012 and 2013 model year vehicles, and (if possible) 2014 and 2015 model year vehicles---similar to the level of detail provided in the EPA templates available at <http://www.epa.gov/otaq/regs/ld-hwy/greenhouse/ld-ghg.htm>.

Please advise.  
Support documentation has been provided that demonstrates how credits were generated for each model.

6. Possible Merger of VW and Porsche: Over the past year, there have been some articles in the press about a potential merger of VW & Porsche. If possible, please provide a brief summary of the status of that possible merger and any potential effects on VW's 2013 GHG compliance plans.

"On September 8, 2011, Volkswagen AG announced that the planned merger with Porsche Automobile Holding SE (Porsche SE) cannot be implemented within the time frame laid down in the Comprehensive Agreement. The decision was reached by the Board of Management of Volkswagen AG following discussions with Porsche SE. Nevertheless, all parties remain committed to the goal of creating an integrated automotive group with Porsche and are convinced that they will succeed in doing so.

The existing legal hurdles, and particularly those resulting from the ongoing proceedings and actions against Porsche SE in Germany and the USA due to alleged market manipulation, made it impossible from Volkswagen's perspective to quantify the economic risks and hence to arrive at a valuation for Porsche SE that could be used to determine the exchange ratio.

Over the past months, Volkswagen AG and Porsche SE have conducted in-depth examinations of whether there are other possibilities, in addition to the put/call options contained in the Comprehensive Agreement, that can be implemented by all parties involved in order to achieve the goal of creating the integrated automotive group with Porsche [AG, the operating business,] on economically feasible terms [earlier than 2014]. These examinations are still ongoing."

Regards,  
Dale Harris  
Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office (EEO)  
3800 Hamlin  
AuburnHills Michigan 48326

United States of America

P: +1 248 754-4218

E: Dale.Harris@vw.com

[attachment "winmail.dat" deleted by David Good/AA/USEPA/US] [attachment "message\_body.rtf" deleted by David Good/AA/USEPA/US] [attachment "2013 Pre MY Report.pdf" deleted by David Good/AA/USEPA/US] [attachment "2014 Pre MY PC.pdf" deleted by David Good/AA/USEPA/US] [attachment "2015 Pre MY PC.pdf" deleted by David Good/AA/USEPA/US] [attachment "2009- 2015 Pre MY AB&T.xls" deleted by David Good/AA/USEPA/US] [attachment "2015 Pre MY LDT.pdf" deleted by David Good/AA/USEPA/US] [attachment "2013 Pre MY PC.pdf" deleted by David Good/AA/USEPA/US]

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/22/2012 8:44:39 PM  
**Subject:** re: 2013 FE Guide - Errors (if any) in Verify as of Aug 22, 2012; last day to correct errors for the Printed Guide is Aug 29, 2012  
[VW Group 2013 FE Guide-all-rel-dates-no-sales-8-22-2012.xlsx](#)

Richard,

re: 2013 FE Guide - Errors (if any) in Verify as of Aug 22, 2012; last day to correct errors for the Printed Guide is Aug 29, 2012

Thanks for your help correcting errors over the last month. Some manufacturers have been correcting errors and have asked me to send them an up-to-date query of the 2013 FE Labels in Verify.

Attached are the data in Verify as of about 1:30 PM on Wednesday, Aug 22, 2012. The error messages (if any) are pretty much as flagged by our macro---I didn't have time to double check the data.

Call or email me if you have questions.

Thanks

Dave

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/23/2012 2:34:02 PM  
**Subject:** MPG & CO2 calculator attached  
[5-cycle 2012 CO2-MPG calcs-for release.8-8-2012.xlsm](#)

Richard,

Here you go.



**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/24/2012 5:49:48 PM  
**Subject:** 2013 FE Guide - data attached  
[VW Group 2013 FE Guide-all rel dates-no-sales-8-24-2012.xlsx](#)

Richard,

Here you go. Please disregard the error message regarding the sales =1-5 vehicles.

It looks like the Gallardo Spyder still has a CO2 error---otherwise OK. Thanks much.

**To:** richard.thomas@vw.com[]  
**Cc:** leonard.kata@vw.com;oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[];  
liver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[];  
N=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 9/14/2012 9:21:01 PM  
**Subject:** re: Question about your 2011 CAFE report

Richard,

We are beginning our review of your 2011 CAFE report and data submittal. The EPA folks who publish the EPA CO2 & Fuel Economy Trends report have asked me why the following vehicles are included in your 2011 Truck CAFE Report (in Verify):

Tiguan (2WD)

As you know, beginning with 2011 CAFE reports, NHTSA regulations & policy requires 2WD SUVs equal to or less than 6000 lbs GVWR will be included in your passenger car CAFE, ref 74 FR 14419, March 30, 2009.

Please let us know as soon as you get a chance. We could use a quick response, if possible, as the 2012 FE Trends report is fast approaching their printing deadline.

Thanks

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/17/2012 4:52:26 PM  
**Subject:** RE: Question about your 2011 CAFE report [Thanks] NNTO  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)  
[\[mailto:Good.David@epamail.epa.gov\]](mailto:Good.David@epamail.epa.gov)

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Cc: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>, "Schmidt, Oliver (EEO)" <Oliver.Schmidt@vw.com>, Jim Snyder/AA/USEPA/US@EPA, Aaron Hula/AA/USEPA/US@EPA  
Date: 09/17/2012 09:58 AM  
Subject: RE: Question about your 2011 CAFE report

Hi Dave;

As we discussed on the phone today, the 2011 Volkswagen Tiguan (2WD) is classified as a truck under the section of 523.5 (a) (5) Permit expanded use of the automobile for cargo-carrying purposes or other nonpassenger-carrying purposes through:

(i) For non-passenger automobiles manufactured prior to model year 2012, the removal of seats by means installed for that purpose by the automobile's manufacturer or with simple tools, such as screwdrivers and wrenches, so as to create a flat, floor level, surface extending from the forward most point of installation of those seats to the rear of the automobile's interior; or.....

This vehicle has the capability to easily remove the second row of seats as it is described in the vehicle owner's manual.

Best regards,  
Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

From: David Good [mailto:Good.David@epamail.epa.gov]  
Sent: Friday, September 14, 2012 5:21 PM  
To: Thomas, Richard (EEO)  
Cc: Kata, Leonard (EEO); Schmidt, Oliver (EEO); Jim Snyder; Aaron Hula  
Subject: re: Question about your 2011 CAFE report  
Richard,

We are beginning our review of your 2011 CAFE report and data submittal. The EPA folks who publish the EPA CO2 & Fuel Economy Trends report have asked me why the following vehicles are included in your 2011 Truck CAFE Report (in Verify):

Tiguan (2WD)

As you know, beginning with 2011 CAFE reports, NHTSA regulations & policy requires 2WD SUVs equal to or less than 6000 lbs GVWR will be included in your passenger car CAFE, ref 74 FR 14419, March 30, 2009.

Please let us know as soon as you get a chance. We could use a quick response, if possible, as the 2012 FE Trends report is fast approaching their printing deadline.

Thanks

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/17/2012 7:28:44 PM  
**Subject:** 2013 FE Guide - Verify data attached  
[VW Group 2013 FE Guide-all rel dates-no-sales-9-17-2012.xlsx](#)

Richard,

Here's the data as of about 2PM today. The Q5 labels seemed OK to me.

Let me know if you see any errors that need correction.

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/20/2012 5:56:04 PM  
**Subject:** re: 2013 FE Guide - Minors Errors to correct in Verify; correcting them will save my review time (every time I run the FE Guide query)  
[VW Group 2013 FEGuide-all rel dates-no-sales-9-17-2012.xlsx](#)

Richard,

Enclosed are the data in EPA's Verify data base as of September 17, 2012.

Please correct the errors in the Indexes which are highlighted in green fill in the first few columns. While these errors are minor and did not hold up posting the data on [www.fueleconomy.gov](http://www.fueleconomy.gov), they will save me a few minutes of my review time each time I run the 2013 FE Guide query (every two weeks or more frequently).

Thanks

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/4/2012 3:53:59 PM  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of Oct 1, 2012 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)  
[VW Group 2013 FE Guide-all-rel dates-no-sales 10-1-2012.xlsx](#)

Richard,

Attached are the data in Verify as of Oct 1, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Oct 3, 2012 for posting on the web. The next normal posting will be October 15, 2012.

Please make any needed corrections as soon as possible.

Thanks

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** leonard.kata@vw.com[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/25/2010 1:36:57 PM  
**Subject:** Fw: Meeting with VW/Audi

Jim,

Please work with Len Kata and our folks to set up the meeting.

Thanks

----- Forwarded by David Good/AA/USEPA/US on 01/25/2010 08:34 AM -----

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Cc: Linc Wehrly/AA/USEPA/US@EPA, "Kohnen, Christoph (VWGoA)" <christoph.kohnen@vw.com>  
Date: 01/22/2010 05:01 PM  
Subject: Meeting with VW/Audi

Hi Dave:

Next week, Lothar Rech from Audi will be visiting our offices. He has requested that I contact EPA and try to set up a meeting, primarily as a follow-up to the meeting we had last September 24, 2009. Topics would include the following:

Test groups for conventional and hybrid vehicle.

Hybrid test matrix and open SOC measurement for SC03 and COLD CO tests.

Status EPA "Dear Manufacturer" letter for hybrid test procedures.

Open points from September 2009 meeting.

Soak times and tests series for conformity tests.

Steps necessary to get an EPA certificate for an electric vehicle.

With respect to the open points from the September 24, 2009 meeting, I will provide you with a brief report of my understanding of those points.

We would be available to meet next Wednesday, January 27, 2010 or Thursday, January 28, 2010. Please let me know if either of these dates would be acceptable and your preferred time.

Just FYI - I have checked my notes from the September 24, 2009 meeting and EPA participants included Linc Wehrly, Marty Reineman, Tom Anderson, Joel Ball, Chris Nevers, Steve Healy, and you.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204



Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Tue 1/26/2010 2:35:26 PM  
**Subject:** Accepted: Fw: Meeting with VW/Audi on HEV cert and testing

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Tue 2/2/2010 6:42:32 PM  
**Subject:** Meeting with Volkswagen and Audi Representatives

Hello Jim:

I am writing to request another meeting (and providing a bit more notice this time!).

Our colleagues from Audi will be in the U.S. during the first week in March 2010 to participate in a number of meetings. They wish to meet with EPA Staff. Unfortunately, they will be in our area for only one day, Thursday March 5, 2010. Would it be possible to arrange a meeting at EPA Ann Arbor on that day?

The discussion topics include:

Presentation and request for approval of a new tank concept for SCR systems in various Audi models equipped with the 3.0L TDI diesel engine.  
Diesel Exhaust Fluid distribution infrastructure.

We have a window of time available between 9:00am and 2:00pm on March 5, 2010. We would like to request about 2.5 hours, sometime within the window. The group cannot meet beyond 2:00 pm due to flight arrangements.

A quick response would be appreciated so that travel arrangements can be locked in this week. Sorry about all of the conditions.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

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Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Tue 2/2/2010 8:10:38 PM  
**Subject:** RE: Meeting with Volkswagen and Audi Representatives

Hi Jim:

I have the date wrong. The request is for Thursday, March 4, 2010.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

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Auburn Hills, MI 48326  
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Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, February 02, 2010 3:03 PM  
To: Kata, Leonard  
Subject: Re: Meeting with Volkswagen and Audi Representatives

Len , do you mean Thursday the 4th or friday the 5th?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 02/02/2010 01:45 PM  
Subject: Meeting with Volkswagen and Audi Representatives

Hello Jim:

I am writing to request another meeting (and providing a bit more notice this time!).

Our colleagues from Audi will be in the U.S. during the first week in March 2010 to participate in a number of meetings. They wish to meet with EPA Staff. Unfortunately, they will be in our area for only one day, Thursday March 5, 2010. Would it be possible to arrange a meeting at EPA Ann Arbor on that day?

The discussion topics include:

Presentation and request for approval of a new tank concept for for SCR systems in various Audi models equipped with the 3.0L TDI diesel engine.

Diesel Exhaust Fluid distribution infrastructure.

We have a window of time available between 9:00am and 2:00pm on March 5, 2010. We would like to request about 2.5 hours, sometime within the window. The group cannot meet beyond 2:00 pm due to flight arrangements.

A quick response would be appreciated so that travel arrangements can be locked in this week. Sorry about all of the conditions.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Tue 2/2/2010 10:33:07 PM  
**Subject:** Accepted: Meeting with Volkswagen/ Audi: new tank concept for for SCR systems

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Wed 2/17/2010 11:24:17 PM  
**Subject:** VW/Audi Meeting

Hello Jim:

I guess that my colleagues from Germany have some additional questions regarding certification of EVs, FCEVs, PHEV etc. They will be in the Detroit area in mid-March. Is it possible to schedule a meeting for the morning of March 18, 2010? This would be in addition to the meeting that we have schedule for March 4, 2010.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Tue 3/2/2010 5:03:05 PM  
**Subject:** Accepted: VW/Audi: additional questions on EV,PHEV cert



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 4/8/2010 3:11:56 PM  
**Subject:** VW Group: Supplemental Information Submitted

Hello Jim,

I have submitted the Supplemental Information to the Verify System for the Audi A8L (TG: BADXV04.23UH) selected for Confirmatory Testing.

Best regards,

Bob

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US  
**Sent:** Thur 4/22/2010 8:46:40 PM  
**Subject:** RE: Road Load Determination Discussion  
<mailto:Wehrly.Linc@epamail.epa.gov>

Len,

Let's pick June 2 at 9:30 am. Let me know if this will be OK.

Linc

Linc Wehrly  
Manager, Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4286  
[wehrly.linc@epa.gov](mailto:wehrly.linc@epa.gov)

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: Linc Wehrly/AA/USEPA/US@EPA  
Cc: "Kohnen, Christoph (VWGoA)" <christoph.kohnen@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
Date: 04/21/2010 05:52 PM  
Subject: RE: Road Load Determination Discussion

Hi Linc:

After discussion with our colleagues, we propose the following meeting dates and times:

Wednesday, June 2, 2010 at 09:30, or  
Wednesday, June 9, 2010 at 09:30

I expect that two people will attend from Germany. With one or two of us from the local office, the total would be three or four people.

Please let me know if one of these dates works.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.

Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

From: Wehrly.Linc@epamail.epa.gov [mailto:Wehrly.Linc@epamail.epa.gov]  
Sent: Friday, April 16, 2010 12:42 PM  
To: Kata, Leonard  
Cc: Kohnen, Christoph (VWGoA); Snyder.Jim@epamail.epa.gov  
Subject: RE: Road Load Determination Discussion

Len,

Thanks for the reply. June would be fine. Why don't you propose a date and time.

Linc

Linc Wehrly  
Manager, Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4286  
wehrly.linc@epa.gov

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: Linc Wehrly/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, "Kohnen, Christoph (VWGoA)" <christoph.kohnen@vw.com>  
Date: 04/16/2010 11:23 AM  
Subject: RE: Road Load Determination Discussion

Hi Linc:

Regarding the meeting to discuss road load determination; I have forwarded the request to my colleagues overseas.

My understanding from speaking with Jim Snyder, is that EPA would prefer to have participation on the part of those directly involved in the road load determination process. In any case, there are currently a number of commitments for previously-scheduled meetings and holidays that take place between now and the end of May 2010. Therefore, we propose to meet in June 2010 (with the exception of the week of June 14, 2010).

Please let me know if this will work for you.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

From: Wehrly.Linc@epamail.epa.gov [mailto:Wehrly.Linc@epamail.epa.gov]  
Sent: Friday, April 02, 2010 2:46 PM  
To: Kata, Leonard  
Subject: Road Load Determination Discussion

Len,

As we begin the process of implementing the new light-duty GHG regulations, we have been reviewing our current compliance practices to see where we need to make improvements. One of the areas that stands out is coast down testing and road load determination. We would like to meet with VW to discuss your current and past road load determination practices, so that we can get a better understand of your process. I'm attaching a list of questions that we would like to discuss. I know this can be a broad subject and we may not be able to address everything in a single meeting, so we may need to schedule some follow-up meetings if necessary. We were thinking the initial meeting would be about two hours. We were hoping to schedule this meeting sometime in the next several weeks.

Please let me know when would be a good time for you to meet. Let me know if you have any questions.

Thanks,  
Linc

Linc Wehrly  
Manager, Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4286  
wehrly.linc@epa.gov

**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com;CN=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Ching-Shih  
Yang/OU=AA/O=USEPA/C=US@EPA[]; N=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Ching-Shih  
Yang/OU=AA/O=USEPA/C=US@EPA[]; N=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Ching-Shih  
Yang/OU=AA/O=USEPA/C=US@EPA[]; N=Ching-Shih Yang/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 4/29/2010 11:02:09 PM  
**Subject:** 2011 FE Guide data for web posting on May 24, 2010 - Please review & let EPA know after the Verify data is error free and ready for posting on www.fueleconomy.gov  
[VW 2010FE Guide all labels for DOE-all rel dates-no-sales 4-9-10.xls](#)  
[Audi 2010FE Guide all labels for DOE-all rel dates-no-sales 4-9-10.xls](#)  
[Audi 2010FE Guide new & revised labels for DOE-all rel dates-no-sales 4-9-10.xls](#)  
[Audi-VW-Etc 2011FEguide-w-sales-all-rel-dates-4-27-10.xls](#)  
[Bentley 2010FE Guide all labels for DOE-all rel dates-no-sales 4-9-10.xls](#)  
[Bugatti 2010FE Guide all labels for DOE-all rel dates-no-sales 4-9-10.xls](#)  
[Lamborghini 2010FE Guide all labels for DOE-all rel dates-no-sales 4-9-10.xls](#)  
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Richard,

Attached are Excel Spreadsheets for each manufacturer which you are handling.

Two Types of 2010 Data Files Provided FYI: One type of 2010 spreadsheet contains new and revised FE Labels since the web was last updated on October 16, 2009. This new data was sent to DOE on April 27, 2010 for web posting as soon as possible. The second type of 2010 spreadsheet contains all 2010 FE Labels in EPA's Verify data base as of April 9, 2010. Please review the 2010 files, make changes in EPA's data base as needed----please email Bob Peavyhouse and me if you see any major problems with the 2010 data as posted on the web.

One Type of 2011 Data File: The third type of spreadsheet contains all the 2011 FE label data from EPA's Verify data base as of April 27, 2010. Please review the 2011 spreadsheet and confirm for your records that the data are correct. Please make sure that the release date is accurate for the models listed. Please double check any new FE Labels which you input into Verify (not listed in this spreadsheet) to make sure they are error free. Any corrections should be made directly in the EPA Verify database. [Do not correct the spreadsheet and send it back.]

The last date to make changes for the 2011 web posting is May 17, 2010. EPA will review the data on May 18 and forward it to DOE on May 19 for posting on the web on May 24, 2010.

Reminders:

1. EPA Comments: Please review all the comments in column 1 of the spreadsheet and make corrections as needed.

2. EPA generated Fields: Please double check the transmission, gas guzzler and model type descriptor fields in the attached spreadsheet (called "Trans as listed in FE Guide (derived from col AA thru AF)" and "Guzzler?" and "Engine Descriptor (40 characters or less)" in the attached spreadsheet). These fields were derived by EPA (and not directly input to Verify by manufacturers). Please be sure they are accurate as they will be used to describe your vehicles on the web.

3. FFVs & Dual fuel Vehicles: For flexible-fueled and dual fuel vehicles, please enter data for both fuels in the same model type index---by clicking on the buttons to "Add Another Fuel Usage" and "Add another Base Level Fuel Usage." Then, for example, enter the gasoline test data in "Base Level Fuel Usage #1" and the E85 test data in "Base Level Fuel Usage #2." Please don't enter the gasoline and alternative fuel data using two separate index numbers.

4. Engine or Model Type Descriptors: If you need to enter a basic engine/model type descriptor (so that customers can easily identify two otherwise identical model types), please enter the descriptor in the Verify "Manufacturer Fuel Economy Label Comments" field. Please be clear and concise (40 characters or less) about the information added in the comment field, for example: Engine descriptor "4-valve" needed for this model type.

5. Relabeling: When relabeling vehicles for reasons specified 40 CFR 600.507(a) and 600.314-08(e)(4), please revise the original Index with the revised FE label information and also revise the release date to the effective date when the FE Label was revised. Please include in the model type comment field the reason for relabeling. Note that the provisions of 40 CFR 600.314-08 state that label values must not change for entire model year, except for 600.507(a) and 600.314-08(e)(4) reasons.

6. New Error Checks: We added a new error check to the spreadsheet which checks the manufacturer's calculation of the unadjusted combined mpg value. If your unadjusted combined mpg value does not agree with EPA's calculation please revise Verify accordingly. Errors in the unadjusted combined mpg value are sometimes caused by entering into Verify incorrectly rounded unadjusted city and/or unadjusted highway mpg values.

7. Forwarded reminders: Also, please read the reminders in the forwarded message below.

Please email me and your EPA team member when your 2011 Verify data is "good to go" (after any needed changes or additions are made to Verify and you are sure that the Verify data is correct).

Regards

----- Forwarded by David Good/AA/USEPA/US on 04/29/2010 04:11 PM -----

From: David Good/AA/USEPA/US

Date: 04/20/2010 06:29 PM

Subject: 2011 FE Guide - Schedule for May, 2010 web release on [www.fueleconomy.gov](http://www.fueleconomy.gov)

To manufacturers,

Here's our tentative schedule for May, 2010 web update for the 2011 FE Guide.

2011 FE Guide Schedule: As you know, EPA and DOE typically put the new models on the web in mid-May, mid-July, Sept (first week) and Oct (second week). Attached is EPA's time line for this year's mid-May posting for early-introduction 2011MY vehicles.

Date	Action
Apr 27 (Tues)	EPA staff performs 2011 FE Guide Verify query (separated by mfr, etc) for EPA review
Apr 28 (Wed)	EPA sends FE Guide data to manufacturers for review & corrections; also sends prelim data to DOE
Apr 29-May 17	Mfrs review & make corrections
May 17 (Mon)	Last day for manufacturers to make corrections and add new data
May 18 (Tues)	EPA staff performs 2011 FE Guide Verify query for EPA review
May 19 (Wed)	EPA sends final data to DOE
May 24 (Mon)	DOE publishes 2011 FE Guide data on web

Reminders:

Release date for 2011 Labels: Please be sure that the release date is correct in EPA's Verify data base. For the May release, we will post FE Labels on the web which have a release date of May 24, 2010 and earlier.

2WD SUV Classification: As outlined in my Feb 24, 2010 email message to the Alliance and AIAM---when labeling 2WD SUVs, please continue to use the same vehicle classification category as in past model years (even though 2WD SUVs equal to or less than 6000 lbs GVWR will be included in 2011 passenger car CAFEs). EPA will require 2011 and later model year 2WD SUVs to continue to be included in the 2WD SUV comparable class for fuel economy labeling purposes, based on the provisions of 40 CFR 600.315-08(a)(1) and 600.315-08(a)(2) as revised in 74 FR 61537, November 25, 2009.

Rounding method changed slightly for mpg-based (derived) 5-cycle FE Labels: The rounding method for derived 5-cycle FE Label calculations changed slightly for reasons outlined in 74 FR 61537, November 25, 2009. The provisions of 40 CFR 600.210-08(a)(2)(i) and (a)(2)(ii) were revised to require the city and highway model type fuel economy values to be rounded to four decimal places prior to calculating the mpg-based (derived) 5-cycle FE Label values. Previously, the city and highway model type fuel economy values were rounded to one decimal place prior to calculating the mpg-based (derived) 5-cycle FE Label values.

Fuel Costs: New 2011 fuel costs will be provided to manufacturers in a future EPA guidance letter. Until the new fuel costs are provided, manufacturers should use the 2010 model year fuel costs provided in CISC-09-16. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG or Hydrogen.

Range of comparable vehicles: Until the 2011 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2010 model year ranges provided in CISC-09-17 (except if a model exceeds the 2010 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

If you have any questions, feel free to give your team member or me a call or send us an email message. I'm at 734-214-4450.

Regards

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Mon 5/17/2010 2:57:58 PM  
**Subject:** Accepted: Road Load Determination Meeting w/ VW



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 5/27/2010 6:09:32 PM  
**Subject:** Supplemental Information for Vehicles Selected for Confirmatory Testing

Hello Jim,

I have uploaded the required Supplemental Information for Bentley vehicle I.D. BY61021 cfigs 0 and 4 and VW vehicle I.D. VW416 80218 cfig 0.

There are also shift tables uploaded for the FTP and HFET for VW416 80218.

This VW is in an Audi test group and the required shift tables were not listed in the Audi database in Verify.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 6/15/2010 7:21:08 PM  
**Subject:** VW Group: Applications and Certificate Requests Submitted

Hello Jim,

This is just a "heads-up" for a couple of certificate requests. The application and certificate request for MY 2011 VW test group BVWXV02.0MPI has been submitted earlier today. Submissions for test group BVWXV02.5259 will be completed by Bill Rodgers by Wednesday morning at the latest.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** CN=David Good/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** [Ex. 6] N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Mary Manners/OU=AA/O=USEPA/C=US@EPA;richard.thomas@vw.com;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; [Ex. 6] N=Mary Manners/OU=AA/O=USEPA/C=US@EPA;richard.thomas@vw.com;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; [Ex. 6] richard.thomas@vw.com;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; [Ex. 6] [Ex. 6] N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA; [Ex. 6] [Ex. 6] erifyhelp@csc.com[]  
**From:** CN=Kassem Abbas/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/16/2010 7:51:48 PM  
**Subject:** Re: Fw: Business Rule Relaxation for Data Substitution Five Cycle Method Labels - Please work with VW to relax the business rule when they process these six labels

CSC,  
I approve relaxing the business rule.  
Thanks

Kassem Abbas  
IT Specialist  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency  
(734) 214 4337 abbas.kassem@epa.gov

**From:** David Good/AA/USEPA/US  
**To:** verifyhelp@csc.com  
**Cc:** Kassem Abbas/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA, Mary Manners/AA/USEPA/US@EPA, [Ex. 6] richard.thomas@vw.com, Jim Snyder/AA/USEPA/US@EPA  
**Date:** 06/16/2010 03:07 PM  
**Subject:** Fw: Business Rule Relaxation for Data Substitution Five Cycle Method Labels - Please work with VW to relax the business rule when they process these six labels

[Ex. 6] and all,

Heads up

Please try to work with VW so that this temporary relaxing of the business rule goes as smoothly as possible. VW especially needs the labels for a newly redesigned 2011 Jetta model which VW executives will be introducing at an auto show this weekend or so (so it needs FE Label values in Verify).

It is OK with me for CSC to relax the business rule for these models.

[There will be quite a few more of these cases (for VW and other manufacturers) thru the summer.]

Thanks

----- Forwarded by David Good/AA/USEPA/US on 06/16/2010 02:56 PM -----

**From:** "Thomas, Richard" <Richard.Thomas@vw.com>

To: David Good/AA/USEPA/US@EPA  
Cc: "Kohnen, Christoph (VWGoA)" <christoph.kohnen@vw.com>, "Kata, Leonard" <Leonard.Kata@vw.com>  
Date: 06/16/2010 02:47 PM  
Subject: FW: Business Rule Relaxation for Data Substitution Five Cycle Method Labels

Hi Dave;

We have at least six more 2011 general fuel economy labels I will have to submit to Verify this week for which data substitution will be used for a 5-cycle label. The business rule will not allow me to do this without special after hours handling and with assistance from the Verify help desk. Did you make any progress to rectify this issue?

Best regards,  
Richard

From: Thomas, Richard  
Sent: Thursday, June 10, 2010 3:43 PM  
To: Good.David@epamail.epa.gov  
Cc: Kata, Leonard; Kohnen, Christoph (VWGoA)  
Subject: Business Rule Relaxation for Data Substitution Five Cycle Method Labels

Hello Dave;

It has become a difficult after hours operation and task for me to submit some of our 2011 general fuel economy labels due to the current business rule which prevents us from entering an index if we have more than one vehicle ID within the five tests grouping when we make data substitution from worse case Cold Co and SC03 tests. The Verify help desk has us call them at 5 o'clock and he in turn must contact the DBA to turn off this business rule before I enter the indexes. Then, after several minutes we must check the in box to see if the indexes have been accepted and then notify the help desk again so they can turn the business rule back on.

I will have anywhere from 10 to 15 more 2011 indexes where we will substitute worse case Cold CO and SC03 tests for a general label calculations. I understand that this was to be changed with an EPA request of the contractor back in December 2009. We are doing everything to comply with the intent of the 5-cycle method for the general fuel economy labeling rule and we have to do it after normal business hours. The Verify system was intended to make our data entry more productive and streamlined and this business rule is not helping. Is there some way we can have this business rule turned off without making it too difficult for the contractor.

Best regards,  
Richard E. Thomas  
VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 6/21/2010 7:49:22 PM  
**Subject:** VW Group: Certificate Request Submitted and Remaining Certification for MY 2011

Hello Jim,

I submitted certificate request for carryover test group BVWXV02.03SA.

Here's what's left for the Volkswagen Group initial certification for MY 2011.

Audi test group:

BAD XV04.2375 – carryover application to be submitted sometime in the next two to three weeks

Bentley test group:

BBEXV06.84LA – currently waiting for confirmatory test decision (Mulsanne)

Lamborghini Test Group:

BNLXV06.5L83 – waiting for OBD approval

Volkswagen test groups:

BVWXV02.0U5N – test waiver requests coming this or next week (new Jetta model in this TDI (diesel) test group)

BVWXV02.03PA – test waiver request coming for CC model with manual transmission this week.

BVWXV03.6U46 – carryover test group to be submitted sometime in this week – waiting for OBD approval

BVWXT03.6U76 – carryover test group to be submitted sometime in the next four weeks

BVWXT03.0HEV – VW's first hybrid – waiting for OBD approval and test results – expected SOP in September

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 6/28/2010 8:07:52 PM  
**Subject:** Another Confirmatory Test Waiver Request

Hello Jim,

Just another "heads-up" for a test waiver request – VW Test Group BVWXV02.03PA (BIN 3 / LEVII SULEV).

We're just adding a manual 6 speed VW CC model to the test group before certification. This is not a new worst case. It's just 5-cycle fuel economy tests. This configuration already exists in a BIN 5 / LEVII ULEV test group.

Best regards,

Bob Hart

Robert Hart

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Fax: (248) 754-4207

E-mail: robert.hart@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 7/8/2010 11:44:10 AM  
**Subject:** Certificate for Test Group BVWXV02.0U5N - 2.0l Diesel

Hello Jim,

Can you check on the status of the signing of the Certificate for Test Group BVWXV02.0U5N (2.0l Diesel)?

Obviously, we can't get an ARB Executive Order until we submit the EPA Certificate to the ARB and their signing procedure takes considerably longer.

Any help you can provide to expedite the process will be greatly appreciated.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

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